



Lake Carriers' Association

The Greatest Ships on the Great Lakes

JAMES H. I. WEAKLEY, PRESIDENT

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Via E-Mail: TSAPRA@dhs.gov

TSA PRA Officer

Office of Information Technology (OIT), TSA-11

Transportation Security Administration

601 South 12th St.

Arlington, VA 20598-6011

Dear Sir or Madam:

**Intent to Request Renewal from OMB of One Current Public Collection of Information:
Transportation Worker Identification Credential (TWIC) Program
Federal Register, Thursday, May 30, 2013
Volume 78, Number 104, Pages 32417-32418**

Lake Carriers' Association (LCA) represents 17 American companies that operate 57 U.S.-flag vessels (lakers) on the Great Lakes. Their vessels carry the raw materials that drive the nation's economy: iron ore and fluxstone for the steel industry, aggregate and cement for the construction industry, coal for power generation, as well as salt, sand, grain and gypsum. Collectively, our members can transport more than 115 million tons of dry-bulk cargo per year, and those cargos generate and sustain more than 103,000 jobs in the eight Great Lakes.

The 1,600-plus men and women who work on our members' vessels are required to have a valid TWIC card. They are also required to have a valid Merchant Mariner Credential and/or license issued by the U.S. Coast Guard. We believe this dual requirement creates an unnecessary burden, both in terms of cost and the time involved in obtaining and/or renewing a TWIC card. Prior to the TWIC card the U.S. Coast Guard thoroughly investigated the background and habits of life of individuals seeking a document or license. There never was any need for mariners on vessels registered in the United States to have a TWIC card. The requirement to have a TWIC card is and always will be duplicative.

We realize it is not the purpose of this public comment period to address the necessity of requiring mariners licensed and documented by the U.S. Coast Guard to have a TWIC card, but we do wish to have our position be part of the official record.

Very respectfully,

James H. I. Weakley
President

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The Association Representing Operators of U.S.-Flag Vessels on the Great Lakes Since 1880

AMERICAN STEAMSHIP COMPANY ♦ ANDRIE INC. ♦ ARMSTRONG STEAMSHIP COMPANY ♦ BELL STEAMSHIP COMPANY
CENTRAL MARINE LOGISTICS, INC. ♦ GRAND RIVER NAVIGATION COMPANY, INC. ♦ GREAT LAKES FLEET/KEY LAKES, INC.
INLAND LAKES MANAGEMENT, INC. ♦ THE INTERLAKE STEAMSHIP COMPANY ♦ LAKES SHIPPING COMPANY
LAKE MICHIGAN CARFERRY SERVICE ♦ PERE MARQUETTE SHIPPING ♦ PORT CITY MARINE SERVICES ♦ PORT CITY STEAMSHIP SERVICES
SOO MARINE SUPPLY, INC. ♦ UPPER LAKES TOWING COMPANY, INC. ♦ VANENKEVORT TUG & BARGE INC.