



Thomas P. Michelli
Chief Information Office, Acting
U.S. Coast Guard
DMF (m-30), DOT
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

December 5, 2014

Dear Mr. Thomas Michelli:

On behalf of the National Marine Manufacturers Association, I appreciate the opportunity to comment on the Federal Register docket USCG—2014—0713, regarding information collection of State Registration Data.

By way of background, NMMA is the nation's leading recreational marine industry trade association, with approximately 1,400 members in North America. NMMA members collectively produce more than 80 percent of all marine products manufactured in the United States. With 12 million registered boats and 88.5 million recreational boating participants in 2013, the boating industry is a significant contributor to the US economy and a substantial job creator for the US market.

Statistical information collected by the United States Coast Guard is critical to the recreational boating industry. This information is used to evaluate safety concerns, fleet totals, and economic impact, among others. For US manufacturers, state specific data is used to assess market strength and opportunities for sector growth. NMMA's own statistical department uses the valuable information provided by the USCG to assist members in a wide array of economic and business decisions. As an industry, this information also allows for an assessment of grant funding, market saturation, safety projects, and potential law enforcement needs.

While NMMA greatly supports the continuing collection of information (ICR) we asked for a reevaluation of the data collected for personal watercraft (PWC). PWC's are an important sector of the recreational boating fleet, with three major manufacturers, representing Yamaha, BRP and

Kawasaki. Currently, the ICR for PWC is not segregated from other boat classifications. Approximately twenty states include PWC statistical information along with inboard or sterndrive boats. This misrepresents not only the inboard/sterndrive market, but fails to provide an assessment of PWC statistics.

NMMA asks USCG to consider mandating to states that PWC data collection is separately maintained. This will ensure accuracy in the entirety of boat classification data collection and significantly aid PWC manufacturers in market assessment. Additionally, as federal agencies consistently look to regulate PWC's as a separate class of boats, state specific data on this vessel type is critical.

We appreciate your consideration of this request and support the continued efforts of data collection by USCG.

Sincerely,

A handwritten signature in black ink that reads "T. Nicole Vasilaros". The signature is written in a cursive, flowing style.

T. Nicole Vasilaros
Director, Federal and Legal Affairs
National Marine Manufacturers Association