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Congress of the United States
House of Representatives
Washington, D.C. 20515

August 6, 1976

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Executive Secretary
Marine Safety Council (G-CM/81)
Room 8117
Department of Transportation
Nassif Building
400 7th Street, S.W.
Washington, D.C. 20590

Re: Docket CGD 74-77; 33 CFR part 164.37

Dear sir:

It has come to my attention that the proposed Coast Guard Navigation Safety Regulations contain no provision to require tankers calling at United States ports to be outfitted with a computerized collision avoidance system (CAS). In view of the widespread and recurring danger of oil spills, I find this decision both surprising and disturbing. This threat to the environment is such that simple prudence would seem to dictate that tankers be CAS equipped. I am particularly disturbed that a section requiring CAS which appeared in the advance notice of the proposed regulations was deleted without satisfactory explanation.

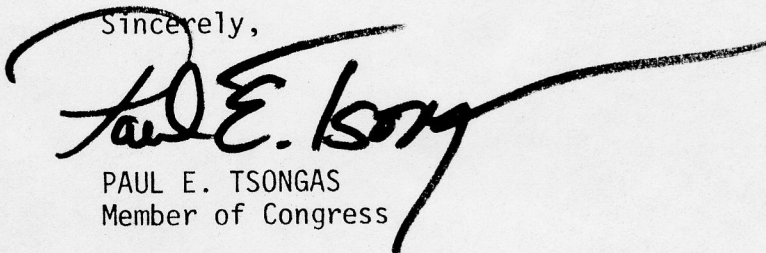
In explanation of the decision to delete the CAS requirement, Mr. Price cites the remarks of four commenters 'that the device is still in the developmental stage'. It seems that these commenters are voicing a decidedly minority opinion, inasmuch as some five hundred of the CAS units are currently in service. I can think of no more authoritative source on the question of a technology's status than the industry for which it is intended. Further, the Maritime Administration has required the installation of CAS devices on subsidized tankers since June 30, 1972. It is hard to imagine a rationale for judging a device to be in the developmental stage when it was not only accepted, but also required by a federal agency over four years earlier.

Finally, the National Transportation Safety Board has gone on record endorsing CAS devices no less than three times in the last eight years, and is now in the process of establishing specifications for CAS devices with the Maritime Administration and the Radio Technical Commission for Marine Services.

Given the number and authority of those who are convinced that CAS is an established technology, I strongly urge the inclusion of a CAS requirement in the final navigation safety regulations. I

further urge that the Coast Guard insist that such a requirement be adopted by the Inter-Governmental Maritime Consultative Organization.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul E. Tsongas". The signature is written in a cursive style with a long, sweeping horizontal line extending to the right.

PAUL E. TSONGAS
Member of Congress

PET/pd