



NATIONAL ASSOCIATION OF STATE BOATING LAW ADMINISTRATORS

January 19, 2007

RE: ICR 1625-0003, Coast Guard Boating Accident Report Form (CG-3865)

To Whom It May Concern:

With regard to USCG 2006 24068, NASBLA would like to submit the following comments:

1. Cause of Death field. This report form is intended to be completed and turned in by the public - a boat owner or operator - following an accident, and the public is generally not qualified to make a cause of death determination. If anyone other than a qualified medical professional enters cause of death on this form, it impeaches the quality of the data collected (even EMTs are not permitted to determine cause of death). If this information is important to collect, this form isn't the appropriate way to do it. In the old form there were only three choices for cause of death; drowning, disappearance, and other. Those choices were sufficient for lay persons.
2. If the cause of death field is retained, the term "heart attack" is inappropriate and should at least be changed to the term cardiac arrest. Some cardiac arrests are the result of a heart attack (a lay term that means inadequate cardiac tissue perfusion) but not all "heart attacks" result in a cardiac arrest.
3. If this field is retained, remove the term hypothermia. Technically one does not die from immersion hypothermia. Hypothermia eventually leads to either unconsciousness and drowning, and/or cardiac arrest, and those are already listed. Secondly, even if hypothermia is suspect, a lay person will not be able to determine it was the cause and even a medical professional would be unable to unless a body core temperature was recorded right at the time of death. Without a life jacket, most people drown in cold water long before they become hypothermic, and those that don't drown die of cardiac arrest.

Sincerely,

John Johnson, Executive Director
National Association of State Boating Law Administrators