



Ohio Department of Natural Resources

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December 17, 2007

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U.S. Department of Transportation
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue, Southeast
Washington, D.C. 20590-0001
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07 DEC 17 PM 12:17

RE: Docket 2007-0008
Collection of Information Under Review by Office of Management and Budget
OMB Control Number: 1625-0003

Dear Sir/Madam:

Thank you for the opportunity to comment on the proposed changes to the United States Coast Guard's Boating Accident Report Form (CG-3865). As the agency in charge of boating safety and enforcement in the state of Ohio, we have a vested interest in ensuring that this form continues to best serve the boaters, while also collecting the data needed to improve programs and decrease the number of boating accidents and fatalities.

Before identifying specific concerns with the new form, there are several general problems with both the new form and the old form that should be addressed. Specifically, this form is designed to be filled out by the boater involved in the accident, who in most cases is not qualified to provide detailed information on injuries (new form, page 5) or the cause of death (new form, page 5). In addition, it seems unlikely that everyone filling out this form would provide an honest answer to the "alcohol use" and/or "drug use" contributing factor options on page 3 of the new form. Both of these items would be more appropriately determined by a law enforcement officer or other qualified individual. Collection of such information might be better accomplished through the use of a two part form – the first part to be filled out by the Operator/Owner, and the second part to be filled out by a qualified law enforcement officer.



Page 2

In regard to the new form's content and layout, please note the following comments:

Page 1

"People on Board Your Boat" – It would be helpful to have the number of persons towed separated from the number of persons on board to clarify the accident situation. In addition, data should be collected regarding the number of people on board, and being towed, that are wearing life jackets.

"Accident Description" – This area should be larger to allow for an accurate description of the incident.

Page 2

"Engine" – Engine make, serial number, and total number of engines should be retained from the prior form in order to provide more detailed information.

Page 3

"Machinery/Equipment Failure" – There is no clear indication in this section that this area may or may not need to be filled out based on the circumstances of the accident.

"Operator/Passenger Activities" – "Pleasure boating" should be included as an option in this area as well.

Page 4

"Accident Details – Other Key People" – Placing this item prior to collection of data on the Operator, Owner, and Injured parties makes the form confusing, especially if the person filling it out failed to review the form in its entirety before beginning to fill it in. In addition, additional spaces may be needed if there are more than two witnesses.

"Operator Safety Measures" – A "not equipped" option should be added under "An engine cut-off switch..."

Page 5

"Injured Person" – More than one space for injured parties should be included here.

"Person Who Died/Disappeared" – More than one space for deceased or missing parties should be included here.

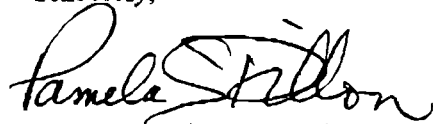
Page 3

Page 6

"Your Boat Operator" – The collection of this information should be moved to the beginning of the form as the Operator is the primary party responsible for the submission of this form.

Once again, thank you for providing an opportunity to comment on changes to this important form. Should you have any questions regarding this submission, please contact Tammy Terry, Data Analyst for the Ohio Department of Natural Resources, Division of Watercraft, at 614/265-6615 or via E-mail at tamara.terry@dnr.state.oh.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela S. Dillon". The signature is fluid and cursive, with the first name "Pamela" being more prominent than the last name "Dillon".

Pamela S. Dillon, Chief
Ohio Department of Natural Resources
Division of Watercraft