



STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION



May 9, 2006

**SUBMITTED ELECTRONICALLY
VIA INTERNET—DMS.DOT.GOV**

Docket Management System
U.S. Department of Transportation
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

RE: Response to Request for Comments—Coast Guard Boating Accident Report Form (CG-3865), Docket Number: USCG-2006-24068

To Whom It May Concern:

This is in regard to the U.S. Coast Guard's request for comments regarding its Coast Guard Boating Accident Report Form (CG-3865). *See* 71 FR 12378 (March 10, 2006). In response to the U.S. Coast Guard's request, the Connecticut Department of Environmental Protection (CT DEP), Boating Division submits the following comments:

1. The CT DEP requests the ability to modify the form to clarify certain information. For example, most boaters do not know whether an accident is required to be reported under state or federal law. In Connecticut, a boater is required under state law to report an accident involving greater than five hundred dollars (\$500) in damage, whereas under federal law a boater is required to report an accident involving greater than two thousand dollars (\$2,000) in damages. Therefore, to make it evident whether an accident is "state" or "USCG" reportable, the state of Connecticut would add "greater than five hundred dollars (\$500) in damage" to the "State reportable" box provided on the form and "greater than two thousand dollars (\$2,000) in damage" to the "USCG reportable" box.
2. In the section of the report entitled "Vessel A (This Vessel)", the CT DEP questions the need for the information regarding a vessel's Vessel Safety Check (VSC) number. No one tracks VSC numbers and many VSC numbers are outdated. If the U.S. Coast Guard requires this information, the CT DEP recommends that the report require only whether or not the vessel has a current VSC number.

In addition, the CT DEP recommends that the U.S. Coast Guard clarify in this section that the information regarding whether a BUI arrest was made is in reference to the accident that is the subject of the report and not to previous BUI arrests.

Finally, the CT DEP questions the need in this section for information regarding the engine serial number(s).

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3. In the section of the report entitled "Accident Events and Contributing Factors", the CT DEP recommends that "cruising" be added to the list of activities in the "Activity at Time of Accident" subsection.

In addition, in the subsection entitled "Contributing Factors", the CT DEP recommends that "sudden medical condition (heart attack, stroke, etc.)" be added to the list of factors.

Finally, in the subsection entitled "Specify 'Equipment Failure'", the CT DEP recommends that the form provide an example of an "auxiliary equipment failure".

4. In the section of the report entitled "Accident Descriptors", the CT DEP suggests that the descriptors provided seem to apply to third party individuals rather than the operator and it is the operator who is typically the person completing the report. For example, if the descriptors provided applied to the operator rather than some third party, "boat found capsized" would state instead "boat capsized".

In addition, the CT DEP recommends that the subsections entitled "Estimated Number of Days Vessel Used this Year", "Typical Number of Hours Vessel Used Each Day this Year", and "Typical Number of Persons on Board Vessel Each Day this Year" be moved to the section entitled "Vessel A".

5. In the section of the report entitled "Other People on Board this Vessel", the CT DEP recommends the removal of the last question in the section requesting information regarding whether the operators of the other vessels involved in the accident completed accident reports as the person completing the form typically would not know that information.
6. In the section entitled "Witnesses not on this Vessel", the CT DEP recommends the replacement of "this Vessel" in the title with "Vessel A". Also, the CT DEP recommends that "separtate" be replaced with the correct spelling of the word, which is "separate".
7. In the section entitled "For Agency Use Only", the CT DEP recommends that "causes based on" be changed to "contributing factors based on" and change "cause", secondary "cause" and tertiary "cause" to "contributing factors".
8. In the section entitled "Person Completing Report", the CT DEP questions why in the subsection entitled "Status of Person Completing Report" the investigator is included in the list of possible persons completing the report as the form specifically states that the operator or owner is required to complete it.
9. In the section entitled "Injured Victims", the CT DEP recommends that the term "contusion" in the subsections entitled "Type of Injury" be either replaced with "bruise" or put the term "bruise" in parentheses next to the term contusion.

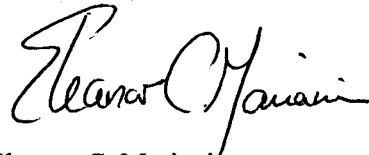
In addition, the CT DEP recommends adding "heart attack" to the list of types of injuries, as heart attacks are often a complication of hypothermia. The CT DEP also recommends that "other" be added to the list of injury causes included in the subsections entitled "Injury Caused By".

Finally, the CT DEP recommends that a subsection entitled "Victim Activity" be added to this section and that "cruising" be included in the list of activities provided in that subsection.

10. In the section entitled "Deceased Victims", the CT DEP recommends that the term "cruising" be added to the list of activities in the "Victim Activity" subsection.

Thank you for the opportunity to provide comments on the Coast Guard Accident Report Form. If you have any questions or require additional information, please contact me at (860) 434-8638.

Sincerely,

A handwritten signature in black ink, appearing to read "Eleanor C. Mariani". The signature is fluid and cursive, with the first name "Eleanor" being more prominent and the last name "Mariani" written in a smaller, more compact script.

Eleanor C. Mariani
State Boating Law Administrator
Boating Division
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Old Lyme, CT 06371

ECM/kk