

April 22, 2019

Submitted to:

The U.S. Coast Guard via www.regulations.gov

Regarding:

Docket No. USCG-2018-0498

Boat Owner's Report; Possible Safety Defect, OMB Control Number 1625-0071

Notice of Coast Guard's Intent to Submit an Information Collection Request (ICR) to the Office of Management and Budget (OMB) regarding extension of approval for this collection

On behalf of the National Association of State Boating Law Administrators (NASBLA), which represents the recreational boating law officials in the 50 states, the District of Columbia, and five U.S. territories (collectively, the "states"), I am writing to comment on this Notice regarding the collection Boat Owner's Report—Possible Safety Defect and the accompanying form CG-5578 (as posted online at <http://uscgboating.org/php-contact-form/consumer-safety-defect-report.php>).

The purpose of this submission is not to challenge the merits of collecting safety defect data from members of the boating public who believe their recreational vessels or associated equipment may contain risk defects or fail to comply with federal safety standards. However, we would like to call attention to programmatic issues associated with the current, narrow approach to collecting this data.

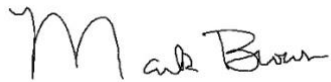
Over the last year, a national project workgroup consisting of representatives from the Coast Guard, the states, and the NASBLA organization has developed an extensive set of recommendations on the recreational boating incident report structure and related systems. Some of the recommendations call for revamping and facilitating the notifications, reporting, and other communications between the Coast Guard and the states as to various safety issues, vessel defects, and recalls.

In its discussions, the project workgroup considered issues with the current, required source of defect reporting—that is, the vessel owner vice a state investigator who identifies a potential vessel safety defect in evaluating the factors that contributed to a recreational boating incident. Under the current reporting framework, a state might have to prompt the vessel owner to submit the information via the online reporting form. If an owner is unable or unwilling to submit the information associated with a potential defect, there currently is not an efficient, well-defined process for the state to easily report the suspected issue to the Coast Guard.

Since all of the project recommendations—including those associated with the reporting of vessel defects and other safety issues—are currently in review by the states as part of the consensus-building process, we cannot incorporate the actual language into this submission. In a future notice on this data collection, NASBLA will be better equipped to comment more extensively. However, for now, we will simply offer that in fulfillment of its statutory authority, the Coast Guard may want to consider the value of expanding the sources of reporting suspected safety issues and defects and develop mechanisms that would facilitate the timely and complete receipt of this information.

We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Mark Brown". The signature is written in a cursive, slightly informal style.

Mark Brown
President