U. S. Department of Homeland Security
United States Coast Guard

Commandant
United States Coast Guard

2100 Second Street, S.W.
Washington, DC 20593-0001
Staff Symbol: G-ICA
Phone: (202) 366-4280
FAX: (202) 366-7124

DEPARTMENT OF HOMELAND SECURITY

U. S. COAST GUARD

STATEMENT OF

REAR ADMIRAL JAMES WATSON
DIRECTOR OF PREVENTION POLICY

ON THE

MARINE CASUALTY INVESTIGATION PROGRAM

BEFORE THE

COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE

SUBCOMMITTEE ON COAST GUARD AND MARINE TRANSPORTATION

U. S. HOUSE OF REPRESENTATIVES

MAY 20, 2008

Good morning Mr. Chairman and distinguished members of the Committee. I am pleased to appear before you today to discuss the Coast Guard's Marine Investigation Program, the Department of Homeland Security (DHS) Office of Inspector General's (OIG) report on our management of marine casualty investigations.

The Coast Guard has broad, multi-faceted jurisdictional authorities and responsibilities to ensure the safety and security of the Marine Transportation System (MTS). The Coast Guard relies upon information developed through detailed investigations of various incidents to prevent recurrences of casualties, strengthen the global MTS, safeguard lives at sea and protect the marine environment. We use the lessons-learned from investigations and oil spills to provide valuable input into standards development, compliance and enforcement, as well as education and outreach programs.

The Coast Guard benefits from external reviews. The DHS OIG recently completed a report of our management of the marine casualty investigations program. We worked closely with the DHS OIG to provide information required to facilitate a transparent review of our program. We generally concur with the DHS OIG's recommendations included in his report and appreciate the efforts of the DHS OIG in documenting areas for improvement. We are taking actions to address these recommendations.

The Coast Guard conducts its own incident investigations to assess adequacy of current procedures, associated implementation, and the need for additional requirements to prevent future marine casualties. For example, at present, we are conducting a Marine Board of Investigation into the tragic loss of four lives associated with the sinking of the fish processing vessel Alaska Ranger.

The Coast Guard works closely with the NTSB. On September 12, 2002, the Coast Guard and NTSB entered into our current Memorandum of Understanding (MOU) regarding marine accident investigations. The MOU clarifies the standards used to determine when the NTSB will lead an investigation and identifies the standards used to determine when a major marine accident involves significant safety issues related to Coast Guard safety functions.

These investigative mechanisms serve to improve the safety and security of the MTS. Rigorous self-scrutiny, third party review and thorough Coast Guard investigations are vital components of our program.

COAST GUARD'S RESPONSE TO DHS OIG RECOMMENDATIONS

In direct response to the DHS OIG's report entitled, "United States Coast Guard's Management of the Marine Casualty Investigations Program," I offer the following responses to the eight recommendations in this report:

Recommendation #1: <u>Develop and implement a plan to increase the number of qualified marine casualty investigators, including hiring civilian marine casualty investigators, and improving the career path for marine casualty investigators</u>.

> The Coast Guard concurs. The Coast Guard is seeking to increase the number of field Investigating Officers (IOs) and marine investigations staff support personnel. We are taking into account current staffing levels and increasing demand for services in our planning efforts. These efforts are part of a broad plan to improve marine safety which is attached as Enclosure 1.

On September 25, 2007, the Coast Guard delivered this plan (Enclosure 1) to Congress to outline efforts to enhance the Coast Guard's Marine Safety Program. Our plan provides a vision and multi-year roadmap for improving the effectiveness, consistency, and responsiveness of the Marine Safety Program to promote safe, secure, and environmentally sound maritime commerce. The Coast Guard will reinvigorate industry partnerships, improve mariner credentialing services, bolster inspector and investigator capacity, improve technical competencies, and expand rulemaking capability to ensure that we meet current and future industry needs.

Consistent with this plan, the President's Fiscal Year 2009 Budget request includes 276 additional Coast Guard Marine Safety personnel. Of these 276 positions, 221 will be marine inspectors and investigators, 28 positions are for program management and training, and 27 positions are for support. There are currently 552 marine inspectors and investigators in the field at Coast Guard units. Therefore, the additional 221 personnel added to the field represent a 40 percent growth in the existing number of marine inspectors and investigators. These personnel will begin to increase our capacity to perform both vessel inspections and casualty investigations.

Recommendation #2: Evaluate re-instituting the four-year tour of duty for active duty marine casualty investigators and ensure that they complete the entire tour of duty as a marine casualty investigator.

The Coast Guard concurs. A return to a four-year tour would provide additional time and training opportunities to develop a strong knowledge base for investigating officers. We also agree that assigned personnel should complete their entire tour in their assigned billet. The Coast Guard Personnel Command recently issued Coast Guard-wide guidance directing field units to ensure personnel remain in their original billet assignment, and we will continue to enforce a four-year tour of duty as broadly as possible.

Recommendation #3: Develop and implement a plan to ensure attendance at the basic and advanced courses for those qualified to attend.

The Coast Guard concurs. Priority is given to individuals who are assigned to Investigating Officer billets and conducting investigations. This was recently re-emphasized in a directive from Coast Guard Headquarters to field units (Enclosure 2).

Recommendation #4: Revise the August 2007 marine casualty investigation qualification standard to include the prequalification of Hull or Machinery, and Small Vessel Inspectors.

The Coast Guard does not concur. Prequalification as a hull, machinery, or small vessel inspector is required to attend the basic marine investigator course. Any one of these inspection qualifications provides the basic knowledge needed to begin investigating officer training. On April 24, 2008, the Coast Guard's Assistant Commandant for Marine Safety, Security, and Stewardship, sent Coast Guard-wide guidance to reiterate and emphasize the importance of policies currently in place that strive to ensure the integrity of the Marine Casualty Investigations program (Enclosure 2). This message states the importance of proper training and upholds core competencies and prerequisites for becoming a qualified Marine Casualty Investigator. We are also working to ensure billets are staffed in the field with a corps of well-trained, certified, and experienced Marine Casualty Investigators. We have completed a review of all personnel conducting marine casualty investigations and are preparing to exchange entry level billets that are currently assigned to Investigations to Marine Inspections, while re-assigning second tour Marine Inspection billets to the Investigations program. This will enhance the level of qualification and experience of all marine casualty investigators.

Recommendation #5: Implement quality controls to ensure marine casualty investigations are conducted at the proper levels to make certain that consistent information is gathered and that causal factors are determined when appropriate.

The Coast Guard concurs. However, quality control measures are already delineated in Chapter A5 of the Marine Safety Manual Vol. V, Commandant Instruction M16200.10A. The Marine Safety Manual outlines suggested levels of effort and types of investigations. The Marine Information for Safety and Law Enforcement (MISLE) database aids in quality control through the requirement for specific data entries based on the level of investigation. For example, if an informal level of investigation is selected, MISLE requires that Causal Analysis be entered. Policy in the MISLE Process Guide also requires at least one level of review of an investigation prior to forwarding to Coast Guard Headquarters. Coast Guard Headquarters staff review investigation activities prior to closure to ensure compliance with policy.

Recommendation #6: Review and revise the criteria for the levels of marine casualty investigations, make any appropriate changes to reduce or eliminate conflicting interpretations, and ensure criteria are consistently applied throughout the Coast Guard.

The Coast Guard concurs. We believe the criteria for the levels of marine casualty investigations established in the Marine Safety Manual Vol. V are clear and sufficient. We ensure consistent application through courses at the Coast Guard's Training Center in Yorktown, VA, periodic training at various units, and informal postings on our web portal. However, we agree there is room for improvement in applying the criteria consistently and are committed to reviewing and revising all criteria.

Recommendation #7: Finalize and issue the Marine Safety Manual.

The Coast Guard concurs. The revised Marine Safety Manual was completed and signed on April 24, 2008.

Recommendation #8: Reorganize the Headquarters review and closure process to include sufficient staff responsible for reviewing and closing marine casualty investigations, and ensure that the review and closure process is completed in a timely and effective manner.

The Coast Guard concurs. We agree there needs to be sufficient resources in place to review and close marine casualty investigations in a timely and effective manner.

The DHS OIG report states that about 8 percent or 1,255 of the 15,327 marine casualties that occurred between January 1, 2003 and October 31, 2006 were not investigated at the level recommended by policy guidance in place at the time, based only on a comparison of the classification criteria with the recorded level of investigation. A simple comparison of dollar amount of damage or other criteria cannot determine whether an investigation was conducted at the appropriate level. Our policy letters and the Marine Safety Manual, Volume V, provide suggested guidelines for the level of investigation. These are not absolute requirements and the Officer in Charge, Marine Inspection (OCMI) has the ultimate authority and responsibility to determine appropriate actions and investigation level in any specific case.

Determination of the proper conduct of an investigation requires a review of the investigative record to be sure it is complete and appropriate for the specific casualty and the lessons to be learned. For example, the DHS OIG report states that 134 casualties should have been investigated at the formal level, but were not. Our review of those cases shows that 79 were conducted appropriately at the informal level, all included causal analysis, and 22 contain safety recommendations. Our review of the remaining cases investigated at the data collection level shows that the level of investigation was generally proper for the casualty circumstances, with eight cases downgraded without an identifiable reason. While we have concurred with the DHS OIG's recommendations in this area and will strive for constant improvement, we do not agree that the picture is as bleak as painted by the DHS OIG.

BACKGROUND: COAST GUARD MARINE INVESTIGATIONS PROGRAM

The Coast Guard's Marine Investigations Program has been a vital arm of marine safety activities since the 1830s when the Steamboat Inspection Service was established. In 1832 alone, approximately 14 percent of the steam vessels in operation were destroyed by explosion and over 1,000 people were killed. These explosions happened largely because there were no vessel inspection laws or rules of navigation. In some cases, mariner incompetence, negligence, and/or misconduct were contributing causes. The U.S. Congress reacted by establishing inspection laws and creating the Steamship Inspection Service. Subsequent revisions to the law created both the Vessel Inspection and Marine Investigations Programs, whose precepts are largely unchanged in today's Coast Guard: 1) to ensure that credentialed mariners are competent; 2) to ensure that the vessel safety laws are observed; and 3) to suggest where new laws or inspection rules are necessary to save lives.

The historical missions have evolved into the modern marine casualty investigations and personnel action segments of the Marine Investigations Program. Our investigation and law enforcement roles have grown to include detecting violations of all applicable federal laws and regulations, taking remedial law enforcement action such as civil penalties and suspension and revocation, investigating pollution, and ensuring compliance with international treaties such as the International Convention on Load Lines, 1966 (ICLL); the International Convention for the Safety of Life at Sea 1974 (SOLAS); the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 (STCW); and the International Convention for the Prevention of Pollution from Ships, 1973, as amended 1978 (MARPOL 73/78).

MARINE INVESTIGATIONS PROGRAM ACTIVITIES

The Marine Investigations Program accomplishes its mission through the investigation of casualties and follow-up activities designed to prevent casualties from reoccurring. Investigative activities are intended to uncover the causes of incidents, document the events and their causes, and initiate the necessary corrective actions. Investigations are also designed to detect and enforce federal law violations. The Office of Investigations and Casualty Analysis at Coast Guard Headquarters provides program guidance for all aspects of casualty investigations, including field investigations, training, outreach and follow up.

Marine investigations are generally conducted after the occurrence of incidents involving vessel casualties, such as groundings, collisions, and sinkings, and personnel injuries, or fatalities.

Investigations are also conducted for:

- vessel seaworthiness;
- violations of statutes the Coast Guard is authorized to enforce;
- incidents involving vessel personnel that may lead to suspension and revocation proceedings or assessment of civil or criminal penalties;
- boating accidents;
- waterfront facility casualties and incidents;
- deepwater port casualties and incidents;
- marine pollution incidents;
- accidents involving aids to navigation; and
- accidents involving installations and other devices on the outer continental shelf.

The Coast Guard conducts over 9,000 casualty and pollution investigations annually, both to assess responsibility and to develop a better understanding of safety issues. These investigations include a focus on the "human element" based on the premise that the cause of 80 percent of casualties can be tied to human factors.

All incidents reported to the Coast Guard, regardless of source, are investigated; however, the Sector Commander through their Officer in Charge, Marine Inspection (OCMI) authority must determine on a case-by-case basis what investigative actions are appropriate for a specific case based on factors such as the likely value to marine safety and risks in a given port.

Depending on the nature and circumstances of a marine casualty, the Coast Guard will conduct either an informal or formal investigation as appropriate. The Commandant of the Coast Guard may establish a Marine Board of Investigation for very serious casualties. The Marine Board will consist of senior Coast Guard investigators and may include investigators from the NTSB.

MARINE INVESTIGATIONS TRAINING AND QUALIFICATIONS

The role of a Marine Casualty Investigating Officer is to thoroughly investigate the cause of a marine casualty. The evidence is analyzed to identify causal factors and human error. Safety recommendations are issued and implemented that address those factors in order to prevent similar casualties from occurring in the future. The Coast Guard initiates administrative, civil and criminal procedures against those responsible when appropriate.

The Coast Guard announced its new suite of Investigating Officer qualifications (Marine Casualty Investigator, Maritime Enforcement Investigator, Suspension and Revocation Investigator, Suspension and Revocation Hearing Investigator, and Pollution Investigator) in August 2007. These qualifications are supported by several training courses held at the Coast Guard’s Training Center in Yorktown, VA, Performance Qualification Standards (PQS), and on-the-job training that must be completed to obtain them.

The current suite of qualifications and training courses are the result of a comprehensive Sector Performance Analysis project initiated in 2004. The study aimed to determine the appropriate level of performance support for the newly created Sectors with the primary focus on improving and updating marine safety personnel training and qualifications. As a result, the Marine Investigations training program updated resident training course curricula, promulgated new job aids to support training and

on-the-job performance, and revised PQS workbooks for all job specialties in the Investigations Program, including Marine Casualty Investigator, Marine Enforcement Investigator, Suspension and Revocation Hearing Investigator, and Suspension and Revocation Investigator.

The Marine Safety Program's Merchant Marine Industry Training (MMIT) program has typically provided one position per year to the Marine Investigations Program. The active duty individual selected for this program works with a particular segment of the marine industry for four to six months to learn how that segment operates, and to become better aware of the challenges faced by the industry, noting unique business methods and observing the effect of regulation upon their operations. An additional benefit of the program is that it opens lines of communication between industry and the Coast Guard.

In order to bolster investigator expertise, additional Investigating Officer training opportunities have been introduced. One significant example is the establishment of an Investigating Officer Professional Development Program at the U.S. Merchant Marine Academy. This program provides Coast Guard Investigating Officers with a better understanding of the marine transportation system including current characteristics of the maritime industry, current trends and influences on maritime safety, Master/Pilot relationships, marine insurance, bridge resource management, shipboard electronics including radar and Automatic Radar Plotting Aids, vessel operations and systems (both deck and engine), and vessel hydrodynamics.

Coast Guard Investigating Officers may also attend the National Association of State Boating Law Administrators boating accident investigator seminars. These seminars provide Investigating Officers with an opportunity to expand their professional investigator skill sets.

The Coast Guard expects that the addition of the 276 additional Coast Guard Marine Safety personnel contained in the President's Fiscal Year 2009 Budget request will further bolster these courses by ensuring that adequate personnel are available at the Sectors to allow attendance.

PROFESSIONALISM

The Coast Guard's Office of Investigations and Casualty Analysis is a recognized authority in marine investigations policy. In addition to using lessons-learned from casualty investigations to improve regulations and Coast Guard policy, we also use investigation information at the field level to educate the public and prevent casualties. These outreach activities include participation in public meetings (e.g. Harbor Safety Committees, Area Committees), various national partnerships (e.g. the National Association of State Boating Law Administrators, Towing Safety Advisory Committee, Boating Safety Advisory Committee, Commercial Fishing Vessel Safety Advisory Committee) and other forums.

The Coast Guard's expertise in marine investigations is also recognized by the United Nation's International Maritime Organization (IMO). Personnel from the Coast Guard's Office of Investigations and Casualty Analysis are members of the U.S. delegation to the IMO Subcommittee on Flag State Implementation and one member chairs the subcommittee's Marine Casualty Investigations and Analysis working group. The main focus of this subcommittee is to identify the problems countries are experiencing in properly carrying out their convention responsibilities and to develop guidance to assist them in solving those problems. Casualty investigation and analysis is always an agenda item for meetings of this subcommittee. At its last meeting, the working group and the subcommittee completed and forwarded for approval the "Code for Investigation of Marine Casualties and Incidents," which is expected to become a mandatory instrument to replace the existing voluntary guidelines.

A member of the Office of Investigations and Casualty Analysis currently chairs the Marine Accident Investigators' International Forum (MAIIF). MAIIF is an international non-profit organization of government marine accident investigators dedicated to the advancement of maritime safety and the prevention of marine pollution through the exchange of ideas, experiences and information acquired in marine accident investigation, and to fostering cooperation and communication between marine accident investigators of all nations across the globe. MAIIF currently has more than 70 members representing more than 40 administrations worldwide.

FEEDBACK AND PREVENTION

The marine casualty investigation and analysis process is an integral part of our marine safety program. The program relies upon an ongoing cycle of review and standards upgrades to effect improvements. We investigate a casualty, analyze the initiating events, issue safety alerts as appropriate, develop standards to prevent reoccurrence, implement new inspection and licensing standards, and adjust waterway safety services. With each new casualty we repeat the cycle in order to effect improvements that will reduce or eliminate casualties.

The Coast Guard's Office of Investigations and Casualty Analysis gathers and analyzes information from many sources (Coast Guard marine safety professionals, the marine industry, open source publications, etc.) to provide trend analysis, track leading and lagging indicators, conduct formal studies and generate reports. These outputs allow Coast Guard decision-makers to determine where to best focus attention and resources to improve marine safety. This information is used for process improvement, to take corrective actions and to increase awareness both internal and external to the Coast Guard.

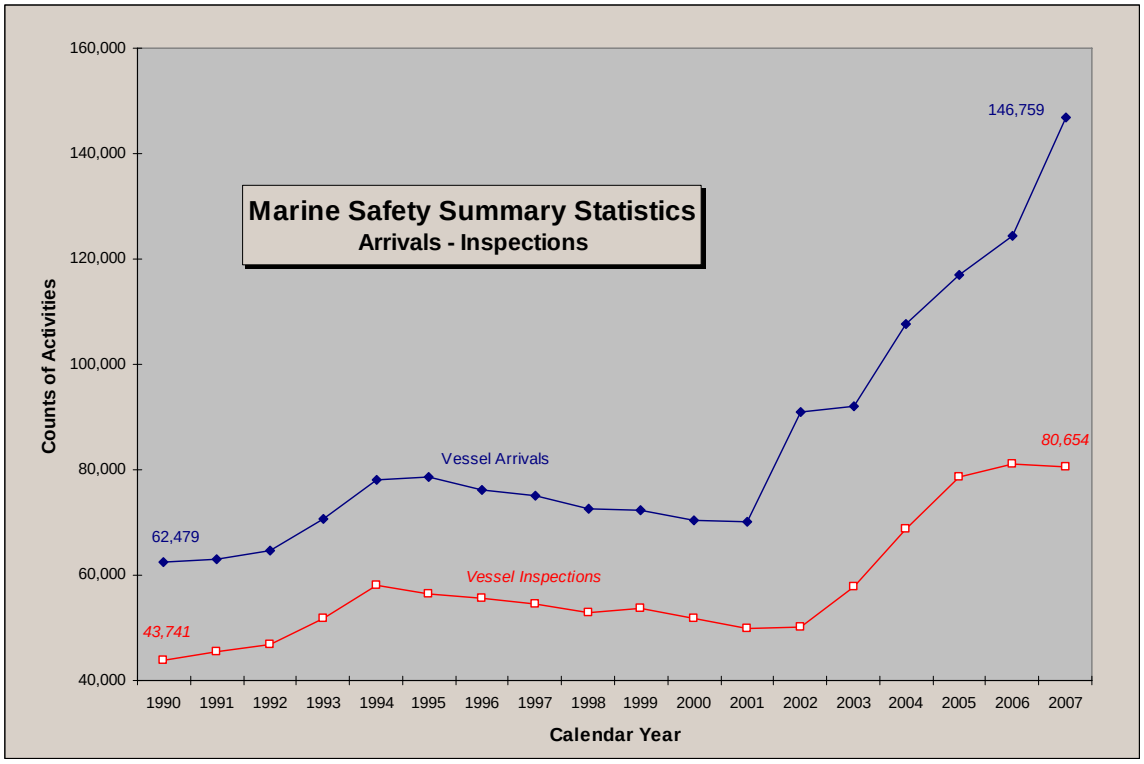
Casualty Investigations: Process Flow

Process improvements may come in the form of Safety Recommendations, which are generally used to create or inform policy, processes, laws and/or regulations; and Safety Alerts which are used to quickly advise the public of conditions that, if left unaddressed, could pose urgent threats to safety in fleets of vessels or particular types of operations and to propose voluntary actions for the elimination or mitigation of those threats. Safety Advisories are used to address ways to improve marine safety focusing on specific vessel operations, practices, topics or other areas that do not require the same level of urgency as Safety Alerts.

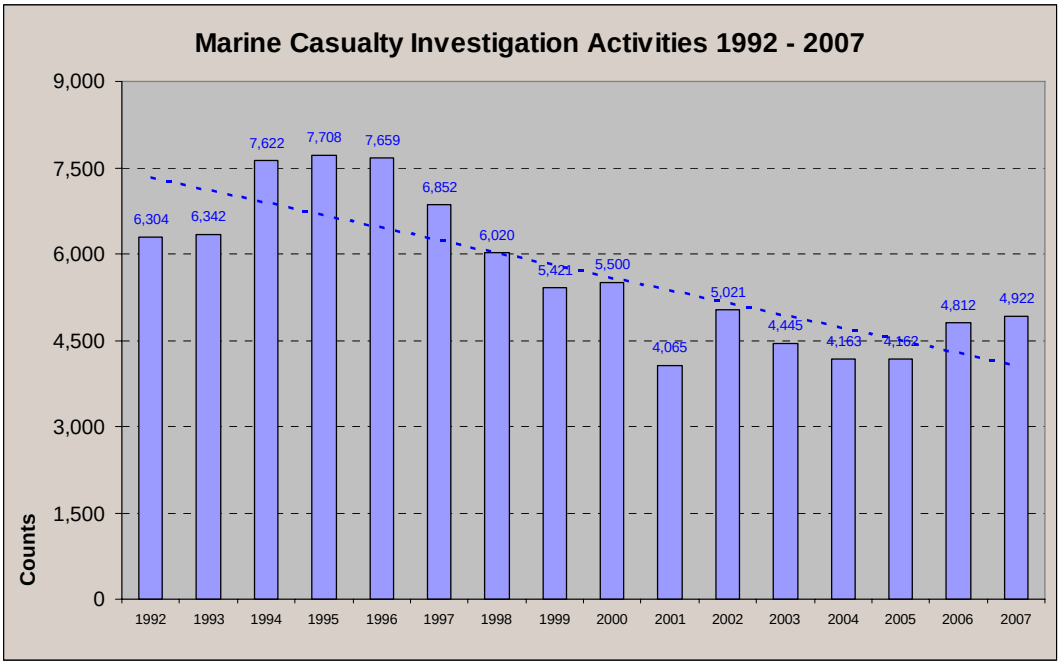
The Coast Guard's Office of Investigations and Casualty Analysis regularly uses its internally-developed Safety Alert Distribution System to share "lessons-learned" from marine casualties to its global maritime audience. When important safety or inspection considerations are discovered during the course of a casualty investigation, these considerations can be distributed within days after the initial inquiry to maritime personnel in private and governmental organizations worldwide. These alerts, emailed to more than 2,500 addressees, are frequently retransmitted through other printed and electronic media outlets and distribution systems, furthering their dissemination.

On May 9, 2008, the Coast Guard issued its first Marine Safety Alert resulting from the information gathered at that time in the ALASKA RANGER investigation. The alert is posted on the public Coast Guard website and was emailed to a list of thousands of stakeholders. The alert recommends vessel owners and operators verify vessel watertight integrity and suggests ways to ensure proper installation and operation of high level bilge alarms. Marine Safety Alerts are just one of several means we employ to provide timely investigation information to the marine industry to help prevent similar casualties in the future.

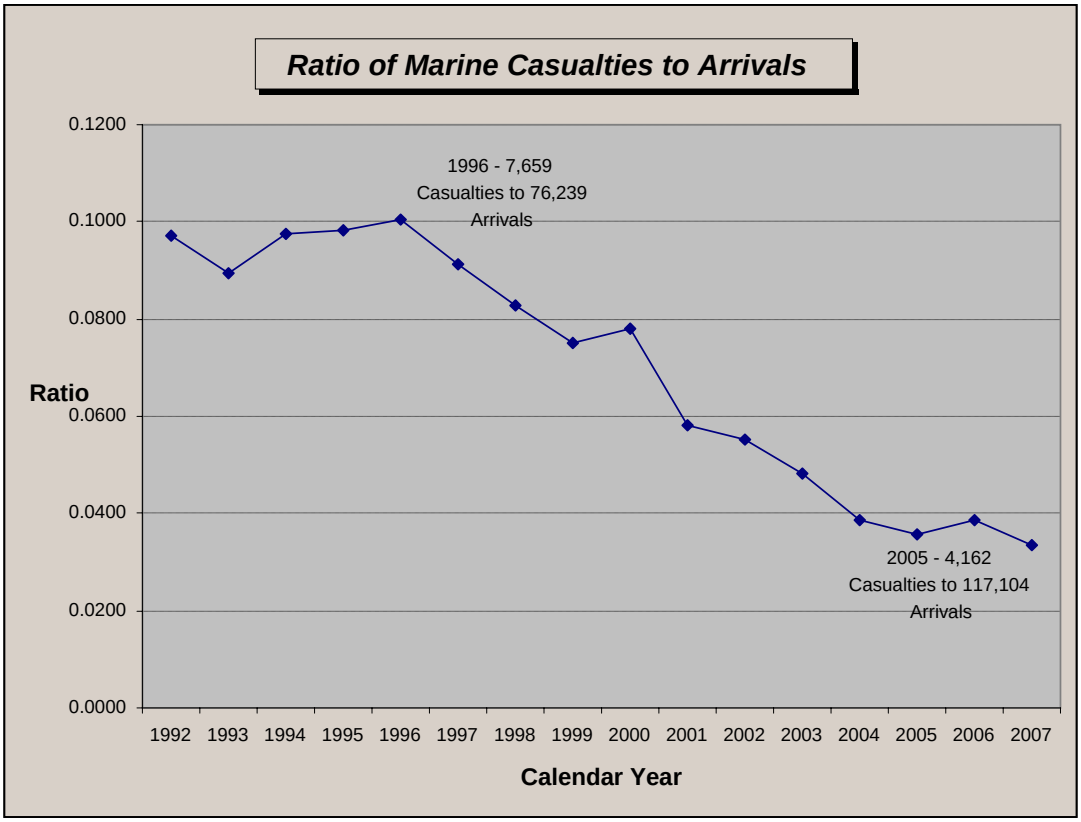
History shows that the Coast Guard's casualty investigation feedback loop works well. Simply put, over the years as maritime activity in the U.S. increased, the casualty rate decreased. For example, vessel arrivals at U.S. ports have more than doubled, and vessel inspections have almost doubled since 1990 (see figure titled "Marine Safety Summary Statistics").



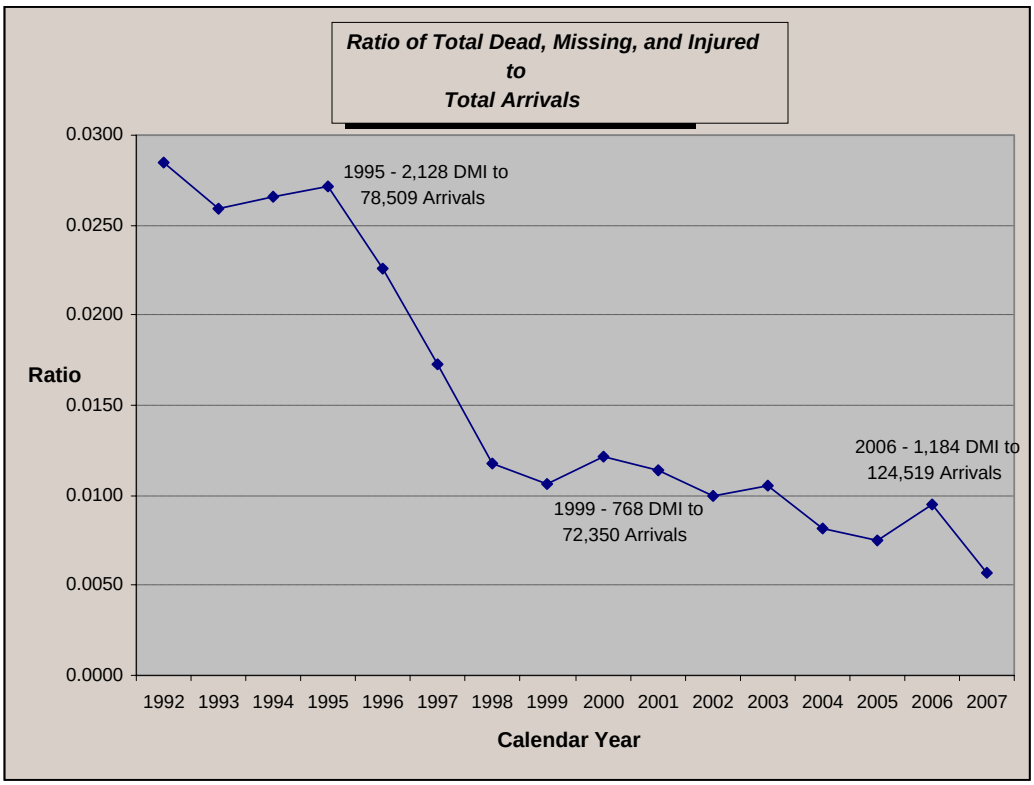
At the same time, the trend for the number of annual casualties continues to diminish (see figure titled "Marine Casualty Investigation Activities 1997- 2007").



The ratio of marine casualties to vessel arrivals shows a dramatic improvement since the early 1990's (see figure titled "Ratio of "Marine Casualties to Vessel Arrivals").



Personnel deaths and injuries resulting from marine casualties are also declining. The ratio of deaths and injuries to total arrivals shows an approximate five-fold decrease (see figure titled "Ratio of Total Dead, Missing, and Injured to Total Arrivals").



The decreases in casualties, deaths, and injuries are clearly significant. Similar trends are seen when comparing casualties, deaths, and injuries to the number of inspections.

We note that, under current law, both the Coast Guard and the NTSB are authorized to investigate major marine casualties. The Coast Guard has many responsibilities in the aftermath of a casualty, and our response activities may last for weeks. In addition to marine safety aspects, our investigations must look into possible violations of law or regulation so that appropriate administrative, civil, or criminal action can be taken. We strongly believe that the existing statutory and investigatory regimes work well and should not be changed. Neither the Coast Guard's nor the NTSB's role in marine casualty investigations should be diminished. Any change would seriously disrupt the existing, well-considered statutory balance and interagency cooperation between the Coast Guard and the NTSB. If there are specific concerns, we stand ready to work with the NTSB and Congress to address those issues in the context of the existing statutory and investigatory framework.

The Coast Guard and the NTSB cooperate closely to ensure that complete investigations are accomplished and all casualty response activities are not impeded. For example, earlier this year, pursuant to the authority established in 46 U.S.C. 6301, the Commandant ordered the establishment of a Marine Board of Investigation concerning the sinking of the Fishing Vessel (F/V) ALASKA RANGER in the Bering Sea on March 23, 2008. The Marine Board, with the full participation and cooperation of the NTSB, held public hearings in Dutch Harbor and Anchorage, Alaska, and Seattle, Washington. The Coast Guard and the NTSB Investigators worked closely to identify potential witnesses, conduct preliminary interviews, and take public testimony in order to thoroughly investigate this tragic loss.

The Coast Guard will prepare its report covering all aspects of the vessel's operations and condition, review any Coast Guard examination/inspection records and activities, and also review the Coast Guard's search and rescue operations. The NTSB will prepare its report independently. The broad experience, technical expertise and diverse backgrounds of the Coast Guard and NTSB personnel, as well as the full cooperation and equal participation enabled both agencies to probe the causes of the casualty to the fullest. The independent preparation of investigative reports will provide the public with thorough, in-depth analysis of casualties from each agency.

WAY FORWARD

On September 25, 2007, the Coast Guard delivered to Congress its plan to enhance the Marine Safety Program (Enclosure 1). This strategy provides a vision and multi-year roadmap for improving the effectiveness, consistency, and responsiveness of the Coast Guard Marine Safety program to promote safe, secure, and environmentally sound maritime commerce. The Coast Guard is reinvigorating industry partnerships, improving mariner credentialing services, bolstering inspector and investigator capacities, improving technical competencies, and expanding rulemaking capabilities to ensure that we meet current and future industry needs.

The 2009 President's Budget request includes $20 million to support an increase in marine inspector and investigator capacity. In addition, the Coast Guard continues to develop a resource strategy to address the following areas identified in the Enhanced Marine Safety Plan:

Improve the Coast Guard's Marine Safety Capacity and Performance

- Strengthen marine inspection and investigation consistency through the addition of civilian positions.
- Increase accessions from U.S. Merchant Marine Academy and maritime institutions.
- Strengthen Marine Safety career paths.
- Expand professional Marine Safety training and education.
- Expand opportunities for maritime industry training.
- Enhance engineering capacity for plan review, policy, and standards development.

Enhance Service Delivery to Mariners and Industry Customers

- Establish Centers of Expertise.
- Improve information technology systems.
- Increase rulemaking capacity to meet regulatory implementation.
- Improve credentialing through greater efficiency, transparency and capacity.

The Coast Guard anticipates the addition of military and civilian positions will create a regimented career path for Investigating Officers that will support the development of competent and experienced personnel capable of consistently conducting complete and accurate marine casualty investigations. The additions will help field units process an ever increasing investigative workload while improving the consistency, accuracy, timeliness and completeness of marine casualty investigations. Improving the quality of marine casualty investigations will in turn enable the Coast Guard and the industry to better analyze casualty trends and identify areas of maritime operations where action is needed to improve safety.

We previously announced the Coast Guard will establish Centers of Expertise to provide venues for professional development and exchange between industry and Coast Guard personnel. Our plans include the establishment of two investigation-related Centers of Expertise (i.e., marine casualty investigations, and suspension and revocation) which are a vital step in the process to improve the Marine Investigations Program and related Suspension and Revocation Program. The Centers of Expertise will increase the overall quality of Coast Guard marine casualty investigations and suspension and revocation proceedings, lead to a more efficient and higher quality service to the public, and increase the overall quality of maritime safety and security.

Another vital step in the process to improve the Marine Investigation Program and related Suspension and Revocation Program is to improve the Marine Information for Safety and Law Enforcement (MISLE) system. MISLE is the Coast Guard central database where marine safety activity information is stored. We anticipate that updates to the MISLE system and a new mobile application will increase the amount and accuracy of the information our investigators are able to document and increase the speed with which that information makes it into the feedback loop available to field commands and other stakeholders within the Coast Guard.

We also anticipate improving the use of MISLE by Investigating Officers in the suspension and revocation process. We envision MISLE being used to generate and file all Coast Guard suspension and revocation documents. This will standardize the process for the creation of Coast Guard suspension and revocation filings, improve the service of filings with mariners, and foster a nationally consistent Coast Guard suspension and revocation policy and process.

CONCLUSION

Preventing marine casualties is a shared goal between the Coast Guard, NTSB and the maritime industry. Marine casualties cause delays to the Marine Transportation System, adversely impact the flow of domestic and international commerce, and impose additional financial burdens on the maritime industry and their customers. Marine casualties also threaten the lives of mariners and citizens alike and often result in damage to the environment. More often than not, marine casualties can be prevented if the causal factors can be identified, understood and properly addressed.

It is vital to preserve the existing, well considered statutory balance and interagency cooperation between the Coast Guard and NTSB

We have the opportunity to prevent many marine casualties from occurring and mitigate the consequences of those that do occur. We can achieve these goals with an adequate corps of well trained and experienced investigating officers who have the necessary tools and resources, including an efficient and comprehensive data system, to accomplish their job.

During his State of the Coast Guard address, the Commandant emphasized the Coast Guard's longstanding commitment to honoring and serving professional mariners. Our plan to enhance the Coast Guard's marine safety program, including our Marine Investigations Program, is a hallmark of this commitment.

Thank you for the opportunity to testify before you today. I look forward to your questions.

ENCLOSURE 1: Marine Safety Improvement Plan

Executive Summary

"Enhancing the Coast Guard Marine Safety Program"
25 September 2007

Background. The Coast Guard ensures the safety of maritime transportation and commerce through a layered, interwoven system of authorities, compliance, collaboration, enforcement and public dialogue. We have been a leader in promoting global maritime safety, security, and environmental protection. Notwithstanding, the maritime industry is experiencing unprecedented complexity and growth, while also facing increased risk from transnational threats. These dynamics lead to a greater demand for Coast Guard Marine Safety services and call for a renewed focus on this core Coast Guard mission.

Way Ahead. While we have taken steps to improve this system, we acknowledge much more must be done. I am directing the development of a strategy that provides a vision and roadmap for improving the effectiveness, consistency, and responsiveness of the Coast Guard Marine Safety program to promote safe, secure, and environmentally sound maritime commerce. The Coast Guard will reinvigorate industry partnerships, improve mariner credentialing services, bolster inspector and investigator capacity, improve technical competencies, and expand rulemaking capability to ensure that we meet current and future industry needs. The Coast Guard will develop metrics to continually assess our progress towards achieving Marine Safety goals and objectives.

This strategy, to be developed in consultation with industry partners, will include the following decisive actions (some of which are underway) to improve Marine Safety mission effectiveness:

Improve the Coast Guard's Marine Safety Capacity and Performance

- Increase marine inspector and investigator capacity.
- Strengthen marine inspection and investigation consistency through addition of civilian positions.
- Increase accessions from U.S. Merchant Marine Academy and maritime institutions.
- Strengthen Marine Safety career paths.
- Expand professional Marine Safety training and education.
- Expand opportunities for maritime industry training.
- Enhance engineering capacity for plan review, policy and standards development.

Enhance Service Delivery to Mariners and Industry Customers

- Establish Centers of Excellence.
- Improve information technology systems.
- Increase rulemaking capacity to meet regulatory implementation.
- Improve credentialing through greater efficiency, transparency and capacity.

ENCLOSURE 1: Marine Safety Improvement Plan

Expand Outreach and Advisory Mechanisms for Industry and Communities

- Establish Assistant Commandant for Marine Safety, Security, and Stewardship.
- Establish a national council of maritime advisors for the Commandant.
- Exercise leadership at international, national, regional, state, and local safety, security, and environmental committees.

We are confident these courses of action will result in needed improvements, although many require additional planning to ensure proper implementation and efficacy. A more thorough review of resource requirements is needed before developing specific timelines and milestones.

ENCLOSURE 1: Marine Safety Improvement Plan

"Enhancing the Coast Guard Marine Safety Program"

Current state. The Coast Guard's Marine Safety program is responsible for ensuring the safe operation and navigation of some 20,000 U.S. and foreign-flagged vessels. We conduct over 70,000 domestic vessel inspections and 10,000 port state control examinations each year to safeguard maritime commerce, international trade and supply chain security. We also conduct 14,000 casualty, suspension and revocation, and civil penalty cases annually to leverage lessons-learned and prevent future maritime tragedies. These missions are accomplished by a cadre of approximately 1,000 uniformed and civilian inspectors, investigators and port state control officers stationed domestically and around the world. They are carried out through a shared commitment with industry to facilitate safe, secure, and environmentally sound marine transportation.

Discussion. The Coast Guard's responsibility to improve Marine Safety service delivery is time-critical given growth trends in the maritime industry and increase in demand for Marine Safety services. Industry growth and increased complexity over the last 10 years outpaced commensurate growth in the Coast Guard Marine Safety program, resulting in a performance gap. For example, last year United States deep-draft seaports and seaport-related firms employed over 8 million American citizens while adding nearly $2 trillion to our domestic economy. From 2002 to 2005, U.S. port calls of large, ocean-going merchant vessels (i.e., over 10,000 gross tons) increased nearly 10 percent to 61,047 according to U.S. Department of Transportation statistics. Moreover, over the last five years, the number of U.S.-flag passenger vessels increased by seven percent and offshore oil industry vessel growth exceeded 35 percent. We recognize industry's concern that our Marine Safety program lacks sufficient capacity to be responsive, inclusive, accessible, and customer-focused. We share in their desire to aggressively address this concern.

Projected growth areas for Marine Safety services include:

- New inspection requirements for as many as 7,000 uninspected towing vessels;
- Market-driven shifts in port activity due to increased demand for such products as liquefied natural gas, petroleum, dangerous cargoes, and containerized freight;
- Proportional growth in marine investigations resulting from industry growth;
- Increased demand for commercial fishing vessel examinations; and
- Continued growth in requirements to publish implementing regulations.

An integrated Coast Guard approach to safety, environmental protection, waterways management, and security best ensures the long-term success of the global maritime transportation system. The goal in preventing or responding to major marine incidents, regardless of cause, is the same: to save lives, preserve property, protect the environment, and minimize disruption to the maritime transportation system. The Coast Guard's operational model is flexible, adaptive, efficient and capable of succeeding with myriad

maritime scenarios. Today, as in the past, our safety, security, and stewardship program goals and authorities to act are inextricably linked.

Following the terrorist attacks of 9/11, our longstanding industry partnerships were critical to protecting the global marine transportation system. These partnerships remain vital today. We must ensure resources match the growing demand for our Marine Safety services. Our marine safety capacity and effective engagement with stakeholders demand senior leadership's attention. We will improve Marine Safety program focus and performance.

Course of Action. The Commandant is directing the development of a strategy that includes the following courses of action, (some of which are underway):

Improve the Coast Guard's Marine Safety Program Capacity and Performance

Increase marine inspector and investigator capacity.
Within budget, the Coast Guard will add more marine inspectors, port state control officers, and investigators. We will use these full-time positions to meet current and anticipated growth in maritime commerce and expansion of the regulated fleet. Demand for inspection and investigation work is increasing and capacity to match these demands must be built and sustained as a result of growth factors such as projected Liquefied Natural Gas (LNG) ships and facilities, thousands of towing vessel examinations, non-tank vessel response plan reviews, ballast water management oversight, and regulatory development.

Strengthen marine inspection and investigation consistency by adding civilian positions.
Within budget, we intend to increase the number of civilian inspectors and investigators. Additional civilian inspector/port state control officer positions and investigating officers will help the Coast Guard retain expertise and geographic-specific competencies while ensuring long-term continuity in critical mission areas. We will distribute civilian positions according to demand and to complement the military workforce. Military personnel must continue to serve as marine inspectors and investigators to ensure innovation, and garner requisite experience for future program management and command responsibilities. A blend of military and civilian personnel is critical to building and sustaining consistency and competence.

Increase accessions from U.S. Merchant Marine Academy and maritime institutions.
The Coast Guard will strengthen recruiting efforts at the maritime colleges through additional liaison officers and by seeking opportunities for Coast Guard officers to serve as faculty at those institutions. Maintaining and sustaining competency within the Marine Safety program begins with recruitment and accession of additional maritime professionals, and active partnerships with maritime educational institutions.

Strengthen Marine Safety career paths.
We will demonstrate the value the organization places on the Marine Safety profession by revising personnel management policies. These policies must continue to ensure a viable career path to the most senior ranks in the Coast Guard, and value and promote the competencies of marine safety specialists. These policies could include, but are not limited

to: direct commission programs; direction and guidance to officer selection panels relating to the need for specific Marine Safety specialties; increased tour lengths; incentives to retain qualified inspectors and investigators; institutional recognition of Marine Safety leadership positions in the field; and continuation contracts for officers possessing critical skills. Recognize those who advance from apprentice, to journeyman, to expert marine safety professional status.

Expand professional Marine Safety training and education.
We recently completed extensive review, update, and field testing of Marine Safety course and qualification material. The Coast Guard will expand formal and informal training and education opportunities to improve Marine Safety competencies, skills and qualifications. These programs will include additional resident educational opportunities for the military and civilian marine safety workforce, and enhanced pipeline training for field personnel to ensure better continuity and consistency in service. Through continuous evaluation, we will ensure training, education and qualification standards are responsive to the dynamics of the marine transportation system. A robust marine inspector and investigator workforce also requires additional expert field personnel to conduct unit training in order to build and sustain these critical competencies.

Expand opportunities for maritime industry training.
The Merchant Marine Industry Training (MMIT) program is a model of industry partnership and professional development. Therefore, the MMIT program will be expanded to include both formal and informal assignments to maximize interaction and experience. We will adjust the MMIT to industry's technological innovations, complexity, and growth as a means for the Coast Guard to better understand and address emerging safety, security, stewardship, and economic issues. The Coast Guard will engage industry within applicable legal and ethical guidelines to maximize training opportunities and fully immerse participants in industry operations. The Ship Rider and other industry familiarization programs will be offered to a larger group of Marine Safety professionals.

Enhance engineering capacity for plan review, policy, and standards development.
We will seek additional capacity and expertise for plan review of vessels and facilities. Increased technical capacity is needed to address plan review of commercial non-tank vessels, marine fire fighting and salvage, standards development and vessel construction specialties at Coast Guard Headquarters and the Marine Safety Center. Increased growth and complexity in ship design and construction, including high capacity fast ferries, LNG ships, mega container and cruise ships, and novel structural designs, call for an innovative and knowledgeable technical staff to develop guidance, standards, and policy. As industry evolves, so too does the demand for technical expertise.

Enhance Service Delivery to Mariners and Industry Customers

Establish Centers of Excellence.
We plan to establish additional Centers of Excellence (COE) to provide venues for professional development and exchange between industry and Coast Guard personnel. COEs will focus on specialized areas of industry to improve inspector competencies and promote consistency across ports. For example, the Coast Guard Cruise Ship COE in Miami, Florida was created to recognize and address cruise ship complexity, industry

growth, and attendant risk. Specialized vessel inspection approaches were developed to improve inspector competence, effectiveness, and efficiency in nationwide cruise ship inspections. The support staff manages a resident 6-day course which provides instruction on USCG policy, and covers technical and management issues for foreign flagged cruise ships. COEs are appropriate for existing industry sectors and projected growth areas including investigations, LNG ships, towing vessels, fishing industry vessels, and outer continental shelf activity. COEs also will provide deployable casualty response and surge capacity.

Improve information technology systems.
The Coast Guard will incorporate tools to improve access and the exchange of information between industry and government using existing marine exchanges as a model. Such systems provide real-time, technology-based information to capture and manage the maritime transportation system. The Coast Guard will enhance web-based portals for sharing information and lessons learned between Coast Guard field personnel and industry, and include Coast Guard office directories and contact methods. The Coast Guard also will provide help-desks and FAQs to facilitate transparency.

Increase rulemaking capacity to expedite regulatory implementation.
The Coast Guard will increase capacity to address current and anticipated rulemaking projects. Increased rulemaking capacity requires additional support for project management, rulemaking development, economic analysis, environmental analysis, technical writing, and administrative law capacity to ensure legal sufficiency and efficacy of implementing regulations. We will publish timely guidance to assist regulated industry with implementation. To the extent practicable, the Coast Guard also will prepare legislative change proposals that minimize required rulemaking process time.

Improve mariner credentialing through greater efficiency, transparency and capacity.
The National Maritime Center (NMC) consolidation began in 2005. Located in West Virginia, recent accomplishments include implementation of the Mission Management System and reduction in cycle time by 25 percent since September 2006. The following milestones will further improve service delivery to the mariner:

- Credentialing help desk fully staffed by February 2008;
- Online self-help application tracking and payment options via www.pay.gov;
- Bulk application processing for academies, schools and industry groups;
- Issue of merchant mariner licensing documents in less than one week; and
- Rebuild primary computer system and implement web-based processing.

ENCLOSURE 1: Marine Safety Improvement Plan

Expand Outreach and Advisory Mechanisms for Industry and Communities

Establish an Assistant Commandant for Marine Safety, Security, and Stewardship
The Assistant Commandant for Marine Safety, Security, and Stewardship will direct and integrate Marine Safety, security, and environmental protection doctrine, policy, plans, and regulations. This flag officer will be the Coast Guard's national Marine Safety leader and will ensure alignment throughout the Coast Guard and among federal and international partners. This flag officer will be responsible for developing and promulgating national policy in prevention, response and waterways management, as well as leading and overseeing the important work of numerous federal advisory committees and industry partnerships.

Establish a national council of maritime advisors for the Commandant.
A council of maritime advisors will inform the Commandant of national maritime trends and issues of concern. This council will draw its membership from industry leaders, governors, academics, former military and government officials, and media.

Exercise leadership at international, national, regional, state, and local safety, security, and environmental committees
We will commit resources to lead, support, and engage these committees to collectively advance the shared goals of safety, security, and environmental stewardship. These fora also offer important opportunities to shape regulatory initiatives, and develop non-regulatory solutions where appropriate. We will incorporate customer engagement using quality processes to elicit maritime input as previously done with the "Prevention through People" philosophy.

Conclusion. The Coast Guard has established a clear way ahead to enhance the Marine Safety program. The proposed courses of action are responsive to external stakeholders and overseers, and supportive of work in progress and ongoing initiatives.

ENCLOSURE 2: Marine Casualty Investigation Officer Doctrine

R 241806Z APR 08 ZUI ASN-A00115000012 ZYB FM COMDT COGARD WASHINGTON DC//CG-5// TO ALCOAST BT UNCLAS //N16732// ALCOAST 194/08 COMDTNOTE 16732

SUBJ: MARINE CASUALTY INVESTIGATING OFFICER DOCTRINE A. COMDT COGARD WASHINGTON DC 191735Z NOV 07/ALCOAST 541/07 B. MARINE SAFETY MANUAL VOLUME V, COMDTINST M16000.10A C. MARINE SAFETY MANUAL VOLUME I, COMDTINST M16000.6 D. COMCOGARD PERSCOM ARLINGTON VA 250057Z MAR 08/ALCGOFF 037/08 E. COMDT COGARD WASHINGTON DC 081630Z AUG 07/ALCOAST 387/07 1. REFERENCE A PROVIDED INITIAL GUIDANCE ON RESPONSE DOCTRINE FOLLOWING SIGNIFICANT INCIDENTS. THIS MESSAGE REITERATES AND EMPHASIZES THE IMPORTANCE OF POLICIES CURRENTLY IN PLACE THAT STRIVE TO ENSURE THE INTEGRITY OF THE MARINE CASUALTY INVESTIGATIONS PROGRAM. IN SUPPORT OF THIS EFFORT, THIS MESSAGE ANNOUNCES THAT REFERENCE B HAS BEEN PROMULGATED THIS DATE AND WILL BE PUBLISHED SHORTLY.

2. THERE HAS BEEN AN OVERALL DECREASE IN THE EXPERIENCE OF COAST GUARD MARINE CASUALTY INVESTIGATING OFFICERS (IO). THIS IS DUE IN PART TO THE ASSIGNMENT OF NEWLY COMMISSIONED OFFICERS AND OTHER OFFICERS THAT DO NOT MEET THE ESTABLISHED PREREQUISITES AND HAVE NO PRIOR EXPERIENCE AS INVESTIGATING OFFICERS AND TO THE INFORMAL, BUT ROUTINE, PRACTICE OF ROTATING THESE OFFICERS THROUGH SEVERAL "PROFESSIONAL GROWTH ASSIGNMENTS" DURING THEIR TOUR AT A SECTOR OR SUBORDINATE UNIT.

3. IN AN EFFORT TO STRENGTHEN THE MARINE CASUALTY INVESTIGATION PROGRAM, COMDT (CG-545) IS DEVELOPING AN ACTION PLAN THAT WILL ENSURE IO BILLETS ARE STAFFED WITH A CORPS OF WELL TRAINED, CERTIFIED AND EXPERIENCED MARINE CASUALTY INVESTIGATING OFFICERS.

UNTIL THE PLAN IS FULLY COMPLETED AND IMPLEMENTED THERE ARE SEVERAL STEPS THAT SECTOR COMMANDERS AND MSU COMMANDING OFFICERS MUST TAKE TO ENSURE THAT THE OVERSIGHT AND COMPLETION OF MARINE CASUALTY INVESTIGATIONS IS DONE BY CERTIFIED MARINE CASUALTY INVESTIGATORS.

4. I CANNOT OVERSTRESS THAT PROPER TRAINING IS ONE OF THE MOST IMPORTANT ASPECTS OF ENSURING OUR PERSONNEL ARE PREPARED AND MOTIVATED TO DO THE JOB. CORE COMPETENCIES, PREREQUISITES FOR BECOMING A MARINE CASUALTY INVESTIGATOR AND COMPLETING EACH STEP IN THE TRAINING AND CERTIFICATION PROCESS, MUST BE UPHELD.

5. COMDT (CG-545) IS RESPONSIBLE FOR DETERMINING MISSION ESSENTIAL TRAINING REQUIREMENTS FOR ALL MARINE CASUALTY INVESTIGATORS IN ORDER TO MEET COAST GUARD AND PROGRAM OPERATIONAL COMMITMENTS.

ONLY COMDT (CG-545) MAY GRANT A WAIVER TO ANY CERTIFICATION OR MINIMUM STANDARD FOR TRAINING. UPDATED PERFORMANCE QUALIFICATION STANDARDS WERE ANNOUNCED IN REFERENCE E. COAST GUARD COMMANDS SHALL ENSURE THAT ALL PERSONNEL REQUESTING AND ASSIGNED TO TRAINING MEET ALL COURSE PREREQUISITES.

6. IN ACCORDANCE WITH POLICY IN REFERENCES B AND C, PERSONNEL ASSIGNED TO AN OPERATIONAL BILLET AS A MARINE CASUALTY INVESTIGATOR SHOULD ALREADY BE FAMILIAR WITH MARINE SAFETY LAWS AND REGULATIONS THROUGH PRIOR TRAINING AND QUALIFICATIONS, GENERALLY, AS A MARINE INSPECTOR PRIOR TO BEING ASSIGNED TO MARINE CASUALTY INVESTIGATION DUTIES. TO FACILITATE THIS REQUIREMENT DURING AY 2009 ASSIGNMENT SEASON AND BEYOND, I HAVE DIRECTED COMDT (CG-545) TO WORK WITH THE APPROPRIATE HEADQUARTERS OFFICES AND PERSONNEL COMMAND TO ENSURE THAT ALL INVESTIGATING OFFICER BILLETS ARE PROPERLY CODED TO INDICATE THE PREREQUISITE QUALIFICATIONS REQUIRED FOR PERSONNEL TO BE ASSIGNED AND TO FACILITATE THE EFFORTS BY PERSONNEL COMMAND TO FILL THE BILLETS WITH APPROPRIATE CERTIFIED PERSONNEL.

7. THE MARINE CASUALTY INVESTIGATIONS PROGRAM IS CONSIDERED AN ADVANCED LEVEL OF THE COAST GUARD MARINE SAFETY COMMUNITY.

ENCLOSURE 2: Marine Casualty Investigation Officer Doctrine

ACCORDINGLY, QUICK INTERNAL ROTATION THROUGH AN INVESTIGATING OFFICER BILLET IS INAPPROPRIATE. PERSONNEL ASSIGNED ARE EXPECTED TO HAVE HAD PRELIMINARY TOURS RENDERING SUCH TICKET-PUNCHING UNNECESSARY. AS WITH SHORT TOURS, ACTIVE DUTY MARINE CASUALTY INVESTIGATORS MAY OCCASIONALLY BE SELECTED FOR REASSIGNMENT WITHIN A UNIT. SUCH REASSIGNMENTS ARE BASED ON THE NEEDS OF THE COMMAND AND ARE OFTEN REQUIRED TO FILL CRITICAL POSITIONS WITHIN THE COAST GUARD. BECAUSE OF THE ENORMOUS INVESTMENT OF TRAINING AND EXPERIENCE REQUIRED TO CERTIFY AS A MARINE CASUALTY INVESTIGATOR AND TO GAIN TECHNICAL COMPETENCE, INTERNAL ROTATIONS AND SHORT TOURS ARE HIGHLY DISCOURAGED AND SHOULD BE MADE ONLY IN ACCORDANCE WITH REFERENCE D.

8. IN ORDER TO BECOME CERTIFIED AS A MARINE CASUALTY INVESTIGATOR, THE IO MUST COMPLETE PQS AND SIT BEFORE A QUALIFICATION BOARD CONSISTING OF PERSONNEL THAT ARE CERTIFIED IN THAT SPECIALTY. TO BE CONSIDERED CERTIFIED AS A MARINE CASUALTY INVESTIGATOR THE IO MUST BE ASSIGNED TO AN OPERATIONAL BILLET AS A MARINE CASUALTY INVESTIGATOR, BE DESIGNATED IN WRITING AS AN IO BY THE COGNIZANT OCMI, HAVE ATTENDED THE BASIC INVESTIGATING OFFICER COURSE (IOC) AT TRACEN YORKTOWN AND HAVE COMPLETED THE MARINE CASUALTY INVESTIGATOR (FO) QUALIFICATION. UNTIL THE IO HAS COMPLETED THEIR CERTIFICATION, THEY SHALL, AT ALL TIMES, BE UNDER THE SUPERVISION OF A CERTIFIED MARINE CASUALTY INVESTIGATOR AND SHALL NOT BE AUTHORIZED TO CONDUCT AN INDEPENDENT MARINE CASUALTY INVESTIGATION. PERSONNEL MUST COMPLETE THE PQS ANNOUNCED IN REFERENCE E. LOCAL QUALIFICATIONS ARE NOT AUTHORIZED. IN ORDER TO ALLOW PROPER IDENTIFICATION OF CERTIFIED PERSONNEL, UNITS SHOULD ENSURE THEY KEEP THE TMT DATA BASE UP TO DATE WITH IO AND OTHER CERTIFICATIONS.

9. IF YOUR UNIT LACKS THE APPROPRIATE CERTIFIED PERSONNEL TO CONDUCT A MARINE CASUALTY INVESTIGATION, THEN YOU SHALL SEEK ASSISTANCE OUTSIDE OF YOUR UNIT. COMDT (CG-545) IS CONDUCTING A STUDY OF THE STATUS OF IO QUALIFICATIONS, INCLUDING PERSONNEL CURRENTLY ASSIGNED TO IO BILLETS AND THOSE WITH IO CERTIFICATIONS NOT ASSIGNED TO IO BILLETS. ON APRIL 18, COMDT (CG-545) REQUESTED DATA FROM ALL UNITS DOCUMENTING CERTIFICATION AND BILLET INFORMATION ON ALL INVESTIGATING OFFICERS. IF, IN THE PROCESS OF COMPLETING THE DATA CALL, A UNIT WITH A SHORTFALL OF CERTIFIED MARINE CASUALTY INVESTIGATORS IDENTIFIES A CERTIFIED MARINE CASUALTY INVESTIGATOR NOT CURRENTLY ASSIGNED TO AN IO BILLET, THE UNIT SHOULD CONSIDER FOLLOWING THE GUIDANCE OF REFERENCE D TO INTERNALLY ROTATE THAT CERTIFIED PERSON INTO AN IO BILLET, OR AS AN ALTERNATIVE, IDENTIFY THEM AS A RESOURCE TO SUPERVISE ALL MARINE CASUALTY INVESTIGATIONS UNTIL SUCH TIME AS THE UNIT IS ASSIGNED CERTIFIED PERSONNEL. IF A UNIT HAS NO CERTIFIED MARINE CASUALTY INVESTIGATORS, COMDT (CG-545) WILL WORK TO IDENTIFY AVAILABLE RESOURCES TO ASSIST.

10. RDML BRIAN SALERNO, ASSISTANT COMMANDANT FOR MARINE SAFETY, SECURITY AND STEWARDSHIP, SENDS.

11. INTERNET RELEASE AUTHORIZED.

BT

NNNN