



Lake Carriers' Association

The Greatest Ships on the Great Lakes

JAMES H. I. WEAKLEY, PRESIDENT

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Via E-mail: tracey.denning@dhs.gov

U.S. Customs and Border Protection
Attn: Tracey Denning
Regulations and Rulings
Office of International Trade
799 9th Street NW, 5th Floor
Washington, DC 20229-1177

Dear Ms. Denning:

**Agency Information Collection Activities: Passenger List/Crew List (CBP Form I-418)
Federal Register, Volume 77, Number 11
Wednesday, January 18, 2012**

Lake Carriers' Association ("LCA") represents 17 American companies that operate 56 U.S.-flag vessels ("lakers") on the Great Lakes and carry the raw materials that drive the nation's economy: iron ore and fluxstone for the steel industry, aggregate and cement for the construction industry, coal for power generation.... Collectively, these vessels can transport more than 115 million tons of dry-bulk cargo per year when high water offsets lack of adequate dredging.

LCA members employ more than 1,600 men and women, all of whom are U.S. citizens or legally admitted aliens, and provide annual wages and benefits of approximately \$125 million. In turn, the cargos our members carry generate and sustain more than 103,000 jobs in the United States and have an economic impact of more than \$20 billion.

We respectfully submit that the subject form should be retired. We do not question CBP's need for this information. The issue is Form I-418 is totally redundant. CBP is already receiving all the requested information when our members submit the Electronic Notice of Approval/Departure (eNOAD) to the United States Coast Guard and Customs and Border Protection. We are at a loss to understand what possible benefit there is from this duplication of effort, and in fact, it is our recollection that the I-418 was supposed to be retired when eNOAD was established some years ago.

We share CBP's desire to keep our borders secure. The Alternative Security Program we developed for our members is more than 200 pages long. But the paperwork burdens on our members are significant and when a form no longer serves a useful or necessary purpose, it should be retired so industry and regulators can focus all their attention on activities that enhance the safety and efficiency of waterborne commerce.

Thank you for the opportunity to comment. If you need additional information, please contact us at your convenience.

Very Respectfully,

James H. I. Weakley
President

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The Association Representing Operators of U.S.-Flag Vessels on the Great Lakes

AMERICAN STEAMSHIP COMPANY ♦ ANDRIE, INC. ♦ ARMSTRONG STEAMSHIP COMPANY ♦ BELL STEAMSHIP COMPANY
CENTRAL MARINE LOGISTICS, INC. ♦ GRAND RIVER NAVIGATION COMPANY, INC. ♦ GREAT LAKES FLEET/KEY LAKES, INC.
INLAND LAKES MANAGEMENT, INC. ♦ THE INTERLAKE STEAMSHIP COMPANY ♦ LAKES SHIPPING COMPANY
LAKE MICHIGAN CARFERRY SERVICE ♦ PERE MARQUETTE SHIPPING ♦ PORT CITY MARINE SERVICES ♦ PORT CITY STEAMSHIP SERVICES
SOO MARINE SUPPLY, INC. ♦ UPPER LAKES TOWING COMPANY, INC. ♦ VANENKEVORT TUG & BARGE INC.