



Lake Carriers' Association

The Greatest Ships on the Great Lakes

JAMES H. I. WEAKLEY, PRESIDENT

440-333-9995 • weakley@lcaships.com

May 15, 2012

Docket No. USCG-2011-1086

Via Fax: (202) 493-2251

Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor
Room W12-140
1200 New Jersey Ave., SE
Washington, DC 20590-0001

Dear Sir or Madam:

**Inland Waterways Navigation Regulations
Federal Register, Volume 77, Number 89
Thursday, May 8, 2012**

Lake Carriers' Association ("LCA") represents 17 American companies that operate 57 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.

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 are writing to state our full support for the proposed redefining of the geographical points which currently demarcate an area of the Detroit River where certain vessels are restricted to speeds not greater than 12 statute miles per hour (10.4 knots). Currently vessels must be checked down to River speed upon reaching Detroit River Light, but Detroit River Light is actually several miles out into Lake Erie. We have advocated that River speed commence at D33 Stationary Light for quite some time.

This change will not increase wake damage or lead to collisions or groundings. It will, however, save industry hundreds of hours each season and therefore allow vessels of all flags to operate more efficiently. As explained in our first paragraph, our members move raw materials that are the basis for our nation's industrial strength. Their customers are engaged in spirited competition among themselves and producers worldwide. The Lakes fleet must operate safely and with respect for the environment, but it must also operate efficiently or the 100,000-plus jobs our members create and sustain will be jeopardized.

Again, we fully support moving the start of River speed to D33 Stationary Light.

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

G:\WEAKLEY\0-LETTER\2012\051512 Detroit River Speed Limit.docx

20325 Center Ridge Rd., Ste. 720 • Rocky River, OH 44116 • Fax: 440-333-999 • www.lcaships.com

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.