



# Lake Carriers' Association

*The Greatest Ships on the Great Lakes*

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Submitted via Federal eRulemaking Portal  
Docket Management Facility (M-30)  
U.S. Department of Transportation  
West Building Ground Floor, Room W12-140  
Washington, DC 20590

Dear Sir or Madam:

**Transportation Worker Identification Credential (TWIC) – Reader Requirements  
Federal Register, Friday, March 22, 2013  
Volume 78, Number 56, Pages 17782-17833**

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Lake Carriers' Association (LCA) represents 17 American companies that operate 57 U.S.-flag vessels (lakers) on the Great Lakes that 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, as well as salt, sand and grain. Collectively, our members can transport more than 115 million tons of dry-bulk cargo per year and employ more than 1,600 men and women, all of whom are U.S. citizens or legally admitted aliens. Annual wages and benefits total approximately \$125 million. In turn, the cargoes our members carry generate and sustain more than 103,000 jobs in the eight Great Lakes and have an economic impact of more than \$20 billion.

We are writing to endorse the proposal that vessels that carry non-hazardous cargoes will not be required to install a TWIC Card Reader. This position in no way suggests that we do not take security seriously. When the Maritime Transportation Security Act of 2002 was enacted, LCA developed an Alternative Security Program for its members. The current version is more than 200 pages long and will be renewed early next year.

We must note, however, that the Great Lakes shipping industry did not need a Maritime Transportation Security Act to ensure the safety of its crews. Access to the vessels has always been tightly controlled. Our members value their employees and don't want them endangered in anyway.

Vessels represent significant financial outlays. A 1,000-foot-long self-unloader would probably cost upwards of \$120 million today. It's just good business to protect such investments.

Any non-crewmember boarding our members' vessels is required to present proper identification. Packages and supplies are screened at the required rates. A TWIC Card Reader would not significantly enhance security on U.S.-flag lakers.

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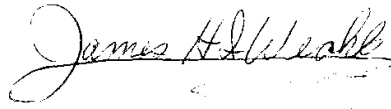
***The Association Representing Operators of U.S.-Flag Vessels on the Great Lakes Since 1880***

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.

The Coast Guard's conclusion that vessels that carry non-hazardous cargo represent a very slight risk is even more valid for our members' vessels because they never leave the confines of the Great Lakes. Most serve ports between Duluth, Minnesota/Superior, Wisconsin, and Conneaut, Ohio. A few trade to Erie, Pennsylvania, and Buffalo, New York. One company loads cement in Bath, Ontario, and in 2012, two companies carried 10 iron ore cargos to Quebec City. However, by Federal regulation, no vessel enrolled in Lake Carriers' Association can sail farther east than Anticosti Island in the St. Lawrence River, so they will never take on crew, cargo or supplies in regions known to harbor terrorists.

In summation, LCA members are committed to the safety of their crews and the safe conduct of waterborne commerce. We believe the security measures currently required of them by the Maritime Transportation Security Act of 2002 represent the proper response for the Great Lakes environment and TWIC Card Readers are not necessary on their vessels.

Very respectfully,

A handwritten signature in cursive script that reads "James H. I. Weakley". The signature is written in black ink and is positioned above the printed name.

James H. I. Weakley  
President