

## Propeller Injury Avoidance Measures

**US Coast Guard Rule: Notice of Proposed Rulemaking for Federal Requirements for Propeller Avoidance Measures: (66 Fed. Reg. 237, December 10, 2001)**

Mail Comments to:

Docket Management Facility (USCG-2001-10163)  
US Department of Transportation, room PL-401  
400 Seventh St. SW  
Washington DC 20590-0001

Fax comments to: 202-493-2251

E-Mail Comments at: <http://dmses.dot.gov/submit/blankdss.asp>

Comments due date: March 11, 2002

**Opening paragraph:** Open your comments with a description of your company (state if you are a small business < 500 employees), where you are located, who are your customers, etc. Let the USCG know you have serious concerns, and why, and let them know that you support the comments filed by the National Marine Manufacturers Association and the Houseboat Industry Association. (NMMA and HIA will provide very detailed cost analysis and legal challenges)

**Main issue:** Your main concern should be that the USCG has identified what they consider solutions to reducing propeller injuries, without supporting the need or the benefit. You want to state that the current USCG accident statistics do not support the "need" for these requirements, nor are there any indications of a trend towards increased propeller accidents on houseboats. You want to state that the \$300 cost for the three combined measures; swim ladder interlocks, clear visibility aft device, and ignition cutoff switch, are seriously underestimated. You also want to state that from your personal experience as a houseboat owner, rental operator or manufacturer you challenge the measurable "benefit" that these devices will provide. Use your personal opinion based on your professional experience.

**Definitions:** The USCG has proposed definitions for a houseboat, non-planing vessel, planing vessel and swim ladder interlock. You will want to comment on these definitions, agree or disagree.

**Closing paragraph:** Summarize your concerns. If you are a small business (<500 employees) state that you are concerned that you have not been considered in the process. State that you want to work with the USCG on this important issue and thank them for the opportunity to provide comment.

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