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To: Department of Homeland Security

U.S. Coast Guard

Reference: Docket No. USCG-2010-0164

National Boating Safety Advisory Council

Subject: BARD training videos for Post Sale monitoring product safety

Thank you for the opportunity to comment.

We are announcing the release of a series of nine training videos on use of the U.S. Coast Guard Boating Accident Report Database (BARD) along with additional BARD training materials.



These materials were not prepared in conjunction with the U.S. Coast Guard.

All BARD training materials are free and can be reached from:

http://www.propellersafety.com/propeller/bard/

The nine training videos provide a total of 2 hours of training:

- 1. Four introductory videos are for new BARD users and preparatory to the boat builder videos.
- 2. Four videos focus on boat builders using BARD to Post Sale monitor accidents involving their boats and/or similar boats.
- 3. One video covers worksheets, tools, and other aids we provide to assist boat builders in using BARD.

These nine videos remove barriers to entry for new BARD users and provide advanced tips for current users identifying accidents involving vessels built by specific boat builders.

Basic techniques for searching BARD are demonstrated along with more complex methods for identifying accidents basic techniques may miss.

Progressively more complex techniques illustrated include:

- 1. Alphabetical ordering of the Boat Manufacturer column for quickly finding some accidents involving vessels built by a specific boat builder.
- 2. Alphabetical ordering of the Hull Identification Number (HIN) column for viewing MIC codes to find additional accidents involving vessels built by a specific boat builder.
- 3. Boolean (AND/OR) searching of the Boat Manufacturer column in combination with the the Hull Identification Number (HIN) column for vessels built by a specific boat builder.
- 4. How to identify spelling and other variants of the boat manufacturer's name, MIC codes, popular boat models, and boat names.
- 5. Incremental searches in which spelling errors and other variants identified in #4 above are used to identify additional accidents involving vessels built by a specific boat builder.
- 6. Redacted Narrative column searches for possible mention of a specific boat builder.
- 7. How to simultaneously search Event 1, Event 2, and Event 3 columns for a specific type of boating accident.

Supporting materials include worksheets, a technical paper on BARD search strategies, several posts on Post Sale monitoring product safety, information of computer hardware and software needed for viewing BARD, tips for viewing BARD on a shoestring, and our iceberg chart on using BARD to identify types of accidents not specifically classified by BARD.

BARD should be a major component of any boat builder's efforts to Post Sale monitor boating accidents. We are attaching a chart, supplied in the supporting materials, showing how BARD fits in with other tools for boat builders Post Sale monitoring product safety.

We encourage boat builders to take advantage of this opportunity to add BARD to their Post Sale safety monitoring program.

If anybody has any questions or problems using these materials, please contact us. Contact information is on our website.

Gary Polson

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Attachment: Post Sale Monitoring Power Boat Accidents Chart

Note: These materials are not professional advice. They are educational materials to stimulate discussion, encourage, and assist boat builders in developing their own processes to best use BARD for their specific situation.

Process for Post Sale Monitoring of Power Boat Accidents

MINING

Historical Data for accidents involving a specific manufacturer or for certain types of accidents

BARD is a major source of historical boat accident data

Google

Current and Historical News Archives, archive.org, UseNet groups Trade Journal archives FOIA requests to States and USCG Court records (PACER) Legal cases (Justia) WestLaw

Forums (fishing, skiing, wake boarding, wake surfing, poker runs, lake forums, boat owners by builder, house boats, pontoons)

Recollection of employees Customer complaints Warranty records of safety parts Sales of safety critical parts

Previous USCG BSCs

Once your Monitoring program gets underway, gradually start reviewing these resources for historical information.

BARD will typically be the best source to start with. Search BARD year by year for accidents involving your products.

Output is specific accidents of interest for further study

MONITORING

Current Sources

Google News - Boat Builder name &/or boat type

Google News Alerts Media

Boat Builder Forums by Brand Boat Builder's Owners Club sites Activity Forums (skiing, fishing) Trade Magazines/online **Television News** Local News Social Media, FaceBook Current Annual BARD database Date limited searching

Personal reports

Visit with peers, Industry Meetings Have employees, Dealers, field reps, tech reps, and legal Dept. on the lookout for accidents

Customer complaints Warranty records of safety parts Sales of safety critical parts

USCG BSC NBSAC BIRMC USCG media reports (BADs) **WSIA**

Monitor, log, and store info on serious accidents & near misses. These records can then be quickly accessed by Management, Product Design, **Product Safety & Legal Depts.**

Additional information may be needed before State accident reports can be requested

When monitoring process identifies an accident,

proceed to Refining process

The first goal for

Mining 4

Mining 4

accidents of interest

REFINING **Information on Specific Accidents**

request State Accident Reports & photos

Backup and use the Monitoring tools more thoroughly on this accident for more info.

If the accident has some age on it, use the Mining tools on it and similar accidents.

If you are concerned there could be more like this one, use the Mining tools for those built by you and other manufacturers of similar boats or drives, plus the Monitoring tools.

What you really want are the State Accident Reports and any associated photographs.

This chart is NOT professional advice.

It is an effort to encourage boatbuilders to develop their own post sale monitoring programs by providing them with materials to stimulate their own conversations about how to best meet their exact needs.

Note - If you lack expertise with the U.S. Coast Guard Boating Accident Report Database (BARD), we provide a series of BARD instructional videos and related materials at PropellerSafety.com/propeller/bard

See Tips, Information & Acronyms on the Accompanying Page

by PropellerSafety.com

21 October 2020

Tips & Information for Post Sale Monitoring of Power Boat Accidents

Search tips

Be aware of compound words (house boat v. houseboat, bass boat v. bassboat, Sea Ray v. SeaRay, etc.)

Also be aware of common misspellings (Sumerset v Summerset) and hyphens (Yar-Craft v. YarCraft)

Learn how to filter out overwhelming search hits from subjects with same name as your target, such as a famous band, last name of famous person, city, TV show, movie, famous singer, pro sports team, fast food place, etc.

Monitor emerging accident scenarios by boat type (house boats, pontoon boats, bass boats, ski boats, wake boats, etc). Remember off throttle PWC steering, carbon monoxide poisoning, pontoon boat bow riding propeller strikes, & pontoon boat gate finger amputations were not initially builder/manufacturer specific.

Monitor Accidents to Make Boats & Boating Safer

The Future

There is a need to encourage all 50 states to report current and historical accidents to Public BARD.

Boat insurance records hold great potential for monitoring Post Sale accidents, but have yet to be made available.

BARD

The U.S. Coast Guard Boating Accident Report Database (BARD) is the number one source for historical monitoring of boat propeller accidents.

Active use of BARD is necessary for an effective Post Sale boat accident monitoring program.

Accident records in the Coast Guard's annual accident database are coded so they can be sorted into three subsets.

- Public BARD an annual database of accident reports received by the U.S. Coast Guard meeting the requirements to be listed in BARD from states and U.S. Territories that allow their accidents to be listed in Public BARD for that year.
- 2. BARD the annual database in #1 above PLUS boating accidents reported from States and U.S. Territories not allowing their accident reports to be included in Public BARD that met the requirements to be included in the annual BARD database.
- 3. BARD PLUS the annual database in #2 above PLUS boating accidents reported to the U.S. Coast Guard Office of Boating Safety statistical office that did not meet the official requirements to be listed in the annual BARD database.

The Coast Guard can run searches in any of the three subsets of the full database. Boat Builders and individuals are only supplied the Public BARD database.

Thus for a very thorough search, one needs to conduct your own search of Public BARD AND engage the assistance of the Coast Guard via a Freedom of Information Act (FOIA) request to search the remaining accidents.

Acronyms & Definitions

BADs - U.S. Coast Guard weekly **B**oating **A**ccidents & **D**eaths reports

BARD - U.S. Coast Guard Boating Accident Report Database

BIRMC - National Marine Manufacturers Association **B**oating **I**ndustry **R**isk **M**anagement **C**ouncil

BSC - U.S. Coast Guard Boating Safety Circular

Date Limited Searching - limiting search to more recent dates

FOIA - Freedom of Information Act

Forums - online gathering places for specific groups/topics/activities Google News - news.Google.com

Google News Alerts - they email you when your search terms come up

JUSTIA Justia.com online Federal court records

NBSAC - USCG National Boating Safety Advisory Committee

Near miss accident - accident with potential to have been much worse PACER - PACER.gov Public Access to Court Electronic Records

UseNet groups - early text based forums: rec.boats, rec.sport.waterski

WestLaw - well known provider of court records

WSIA - Water Sports Industry Association

BARD Under Reporting

Many boaters do no know they are supposed to report boat accidents, do not have the ability to complete and submit boat accident reports, or ignore their responsibility to report.

Several efforts have been made to estimate under reporting. The boating industry and the Coast Guard feel fatal accidents are almost all reported, something near 99 percent. We do not agree.

Some studies show about 80 percent of those hospitalized from boating accidents were in a reported accident.

Some estimates suggest only 5 to 10 percent of minor injury accidents are reported. Other estimates are lower.

Use our iceberg chart to visualize and better understand under reporting and the various versions of BARD.

http://www.propellersafety.com/wordpress/wp-content/uploads/bard-iceberg-chart.pdf