

## **MSPPP Comment Summary**

The Coast Guard presented the FY 2009–2014 Marine Safety Performance Plan for comment through its Internet Web site in May 2008 and received over 200 comments from internal and external stakeholders. Those commenting represented the mariner, pilots, industry, government contractors, and state and federal government. The comments covered a wide range of issues related to the broad range of services the Coast Guard Marine Safety program provides to the public, including the goals and objectives, challenges, and initiatives highlighted in the Performance Plan. All comments received were considered for incorporation in the plan, some were used to revise the plan, others were reserved for future implementation in different programs, and others were found to already exist in modified form in the plan.

Number of comments/number of respondents per particular section of the plan:

### **Mission, Goals and Objectives: (11 Comments / 7 Respondents)**

Most of the comments received discussed the focus of the performance plan on a single mission area. This is the first time the overarching program was presented in mission segments, and stakeholders responded to the change. Planning, connections to higher order strategic plans, impacts on the Standard Operational Planning Process (SOPP), performance measurement, budgeting, and resource decisions were also subjects of comments. As the Coast Guard continues to refine and implement the planning and budget cycle process, future-year performance plans will build on this document and the comments received to become a key means of identifying both these connections and gaps.

### **Initiatives:**

#### **Superior Workforce (80 Comments / 28 Respondents)**

Comments received for the Superior workforce initiative came from a wide pool of respondents, although most were from internal sources. The issue was generally discussed in terms of the current state and challenges involved in closing the gap to desired end state. The gap primarily addressed was the competency of the inspector workforce. Suggestions for improving competency ranged from requiring sea-time (military or industry), to other industry training, to better classroom and OJT, to accessions and inspector pool mix (hiring more merchant academy graduates, more civilians, more warrant officers), to longer tours, to specialization, to expanding the ACP program, to adding resources based on projected need, to splitting the OCMI function out of the Sector. Of particular note is the change in the plan to 340 marine safety personnel being added to the program (276 in previous draft).

#### **Superb Service Delivery ( 28 Comments / 13 Respondents)**

Comments received for the Superb Service Delivery initiative came from a wide pool of respondents, and most discussed the issue in terms of the current state and challenges involved in closing the gap to desired end state. Some of the concerns raised were beyond the scope of this plan, being aimed at the Coast Guard's organization of its service providers (Sectors; National Maritime Center). Others commented on individual facets of the mission delivery (i.e., changes to regulations and published guidance, inspector tour length, and composition of inspection force (civilian/military and warrant/commissioned officer)). Comments also addressed responsiveness, outreach, partnership, and developing enough

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knowledge of the regulated community to evaluate and accept novel ideas or proposed equivalencies and apply risk-based decision-making, especially involving security boardings.

### **Quality Management (9 Comments / 7 Respondents)**

The comments regarding Quality Management focused primarily on the implementation of this initiative, including the data to be used to determine mission performance and the process for an independent evaluation including industry feedback.

### **Boat Safe (7 Comments / 4 Respondents)**

Comments on the Boat Safe initiative were primarily focused on Coast Guard resources available and authority for this initiative, including the Coast Guard Auxiliary's role, possible impacts of increasing emphasis on security, impacts to Coast Guard resources available, and possible future requirements on boaters.

### **Tow Safe (38 Comments / 9 Respondents)**

Comments received on the Tow Safe initiative indicated areas of concern for industry representatives who provided information about the mix of the nation's towing fleet and the role they play in the nation's economy. They also emphasized the positive steps being taken by the Coast Guard and industry to promote safety including the ongoing partnership, Towing Safety Advisory committee, and the development of a risk-based inspection program. Other comments addressed the apparent focus on inland towing, casualty definitions, investigative civil penalty actions, and the lack of the government in viewing the industry practice in terms of the environment in which they operate (e.g., obstructive bridges, variable channels, and poorly designed locks).

### **Fish Safe (8 Comments / 9 Respondents)**

Comments on the Fish Safe initiative were primarily internal and spoke to the lack of specific engineering-standard regulations and to the lack of differentiation of the Coast Guard's law enforcement authority whether conducting dockside voluntary exams or at-sea boardings. Additional comments on this topic spoke toward placing a greater emphasis on engaging with the fishing stakeholder.

### **Miscellaneous Comments (25 Comments / 5 Respondents)**

These comments were primarily editorial in nature.