

## Eareckson, Peter

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**From:** Eareckson, Peter  
**Sent:** Friday, July 02, 2010 22:13  
**To:**

**Subject:** Round 2 Option/Variant Questionnaires (Due 23 July 2010): SLF Tonnage CG  
**Attachments:** Resolution of Round 2 Comments.pdf

Good day to you all:

I wish to thank everyone for the Round 2 input, which has proven most illuminating and helpful. This input includes comments on the two variants identified in Round 1, suggested approaches and content for Round 2 questionnaires, and comments of a general nature which will be of much assistance as the group develops the final report in Round 3.

Via this email, I am distributing questionnaires developed based on this input which address all options and variants. The questionnaires are available at [http://www.uscg.mil/imo/slf/docs/tonnage/Evaluate\\_Options\\_and\\_Variants\\_Questionnaire\\_Rev\\_0.pdf](http://www.uscg.mil/imo/slf/docs/tonnage/Evaluate_Options_and_Variants_Questionnaire_Rev_0.pdf) and are due on Friday, 23 July 2010 per the schedule of the Action Plan at [http://www.uscg.mil/imo/slf/docs/tonnage/Action\\_Plan\\_Rev\\_0.pdf](http://www.uscg.mil/imo/slf/docs/tonnage/Action_Plan_Rev_0.pdf). As before, please limit responses to one questionnaire per country, NGO, etc. Note that the questionnaires provide space to address comments made by other participants during Round 2 on any option or variant.

I have attached a document with summarizes principal comments related to the questionnaires, and includes a brief resolution of each. While I've done my best to ensure all comments were adequately addressed, if I have overlooked your input, or not resolved comments to your satisfaction, please let me know. There is still time in the schedule to make appropriate amends, and ensure that your views are reflected in the group's work.

As was the case with the Round 1 questionnaires, the Round 2 questionnaires were created using Adobe Forms 8.0, and are best completed electronically, saved, and then returned to me via email, with a copy to the other group participants. Unfortunately, the questionnaires are not compatible with earlier versions of Adobe (you can save and print a blank copy of the questionnaires using earlier versions of Adobe, but you will not be able to save the completed questionnaires). So, if you experience difficulty saving the completed questionnaires, please try to upgrade to the latest version of Adobe if you can. In the event that this is not possible, please contact me so we can make other arrangements. Also, don't hesitate to contact me if you don't understand any questions or issues addressed in the questionnaires, or otherwise need assistance.

With my thanks in advance for your help in completing this Round 2 work item, and my warmest regards to you all.

Sincerely,

Peter Eareckson  
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SLF Tonnage Correspondence Group  
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Tonnage CG Website: <http://www.uscg.mil/imo/slf/tonnagecg.asp>

## Resolution of Comments on Round 2 Questionnaires

A summary of comments that pertain to Round 2 questionnaires, and the resolution of each, follows.

1. **Comment:** One participant suggested that explicit reference to amending the TM Convention be dropped when describing Option C, noting that  $NT_{Adj}$  could be implemented along the lines of Option A as a remark on the International Tonnage Certificate without the need to amend the TM Convention.

**Resolution:** For the purposes of completing the Round 2 questionnaires, assume implementation of Option C does not require an amendment to the TM Convention. Removal of this constraint allows a more equitable comparison of different approaches during this evaluation phase.

2. **Comment:** Several participants commented on the need for additional Round 2 questionnaires to: (1) ascertain views on continuing to pursue Option D; (2) address approaches based on deadweight tonnage as opposed to full load displacement tonnage; and (3) examine each option and variant separately (along with specific recommendations on information to be gathered).

**Resolution:** Due to the wide range of Round 2 responses and the short time available for evaluating the newly proposed variants, a standardized questionnaire was developed evaluating only the existing options and variants, using the Round 2 suggestions on information to be gathered. It is hoped that the results of these questionnaires will provide a useful basis for comparison of all options and variants, and assist in development of the final report of the group.

3. **Comment:** Several participants suggested the possibility of using a questionnaire or other means to evaluate combining and/or relabeling different options and variants. For example, one participant suggested that Variant D2 be categorized as a variant of Option A (and labeled Variant A1) and that Variant D1 be combined with Option A (or alternately labeled as Variant A2). Another participant suggested that Variant D1 could be applied in combination with Option A or Option B.

**Resolution:** From the preliminary Round 2 comments, there was no clear consensus on the viability of the proposed variants, with some participants voicing supporting and others voicing reservations. In addition, some confusion was expressed about the variants, with clarification provided by subsequent comments. With this in mind, before proceeding with suggestions to combine or relabel variants, it was deemed prudent to first ascertain the sense of the group on the overall viability of each individual option through the standardized questionnaire discussed in the resolution to Comment #2 above. Sufficient time remains after the results of the questionnaire are received (deadline 23 July 2010), should the group decide that combining and/or relabeling options is appropriate.

4. **Comment:** Several participants suggested that questionnaires seek input from each participant on the relative ranking (order of preference) of the options or variants.

**Resolution:** Refer to the resolution to Comment #2 above. Paragraph 4 of the standardized questionnaire gives participants the opportunity to express their opinions on further development of an option or variant in terms of “Strongly Favor”, “Disfavor”, etc. Based on this information, and other input from the questionnaires, a relative ranking of the options and variants can be made (e.g., as part of the Round 3 work in drafting the final report), and accordingly an additional questionnaire on this subject was deemed unnecessary at this time. Note that in some cases, relative ranking may be problematic, as implicit in several of the responses was the view that certain options/variants could be pursued independently and in parallel (e.g., Option A and Option B).

Tonnage CG Participant Name:

Date Completed:

**Option A: Improve integrity & uniform implementation of the existing gross tonnage (GT) and net tonnage (NT) parameters.** This proposal seeks to ensure the integrity and uniform implementation of the existing GT (overall size) and net tonnage NT (useful capacity) volumetric parameters, by expanding and strengthening the interpretations of Tonnage Measurement Circular TM.5/Circ.5. It will include a review of treatment of semi-open spaces which cause the tonnage disparities between containerships of open and closed designs, as well as treatment of deck cargo. Under this option, possible changes to the TM Convention related to the existing GT and NT parameters could be identified and further developed, as necessary.

**1. In your opinion, will this Option/Variant resolve in a substantive way the tonnage-related problems listed below, assuming that the Option/Variant is adopted and fully implemented.**

<u>Will the Option/Variant resolve:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Reduction of size of crew spaces due to tonnage concerns?	<input type="checkbox"/>				
b. Carriage of more cargo on deck due to tonnage concerns?	<input type="checkbox"/>				
c. Economic disadvantages of open vs. closed containerships?	<input type="checkbox"/>				
d. Undesirable design features <sup>1</sup> caused by GT/NT rules?	<input type="checkbox"/>				
e. Lack of integrity/uniformity in applying GT/NT rules?	<input type="checkbox"/>				
f. Use of GT, instead of NT, when assessing fees?	<input type="checkbox"/>				

**2. In your opinion, will this Option/Variant cause or lead to the tonnage-related problems listed below, assuming that the Option /Variant is adopted and fully implemented.**

<u>Will the Option/Variant cause or lead to:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Unintended negative impacts on crew <sup>2</sup> ?	<input type="checkbox"/>				
b. Undesirable hull shapes/dimensions to minimize tonnage?	<input type="checkbox"/>				
c. Reduced scantlings/ballast to minimize tonnage?	<input type="checkbox"/>				
d. Lack of integrity/uniform application of the Option/Variant?	<input type="checkbox"/>				
e. Obstacles to innovation in ship design?	<input type="checkbox"/>				
f. An overall decrease in ship safety?	<input type="checkbox"/>				

**3. Please provide your assessment of the viability (in other words, practicality of implementation) of this Option/Variant, by responding to the questions below.**

<u>Will the Option/Variant:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Involve complex or difficult calculations for future ships?	<input type="checkbox"/>				
b. Involve complex or difficult calculations for current ships <sup>3</sup> ?	<input type="checkbox"/>				
c. Require reissuing International Tonnage Certificates?	<input type="checkbox"/>				
d. Require amendment to the Convention to be fully effective?	<input type="checkbox"/>				
e. Have broad appeal?	<input type="checkbox"/>				
f. Generate any major opposition? Provide details on reverse.	<input type="checkbox"/>				
g. Experience widespread use/adoption/implementation?	<input type="checkbox"/>				
h. Change the basis on which fees are assessed?	<input type="checkbox"/>				
i. Allow for maximum flexibility/innovation in ship design?	<input type="checkbox"/>				
j. Improve the overall safety of ships?	<input type="checkbox"/>				

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Notes:

1. Examples include opening of spaces to the sea and weather, and replacing pontoon hatch covers with externally framed covers.
2. An example is crew fatigue due to poor seakeeping characteristics resulting from boxy hull shapes or removal of ballast to optimize tonnage.
3. Consideration should be given to availability of existing data that could be used as a basis for the calculation.

**(Questionnaire for Option A: Improve Integrity/Uniform Application)**

**4. Please provide your overall opinion regarding this Option/Variant.**

Strongly Favor

Favor

Neutral

Disfavor

Strongly Disfavor

No Opinion

**5. Benefits / Disadvantages of this Option/Variant** *(Please only list benefits or disadvantages of this Option/Variant that are in addition to those identified in Questions 1-3 of this questionnaire, or that have NOT been previously circulated to this, or prior, correspondence groups).*

**6. Remarks/Comments/Amplification of Responses for this Option/Variant** *(You may also use this space to provide general comments in support of, or opposition to this option/variant, including responses to comments from or concerns raised by other participants. You may attach additional sheets, as necessary)*

**Option B: Promote use of the existing net tonnage parameter for tonnage-based fees, but take no other action.** This proposal seeks to promote use of the existing net tonnage parameter (NT) without the need for amendments to the 1969 Tonnage Measurement (TM) Convention. The parameter favors ships with higher freeboards, and its use for assessing fees – in many cases - would avoid the gross tonnage “penalty” for the volume associated with crew accommodation spaces. Because NT reflects cargo volume and numbers of passengers carried, but cannot be less than 0.3 GT, the tonnage “penalty” for crew spaces would remain in effect for some vessel types (e.g., towing vessels).

**1. In your opinion, will this Option/Variant resolve in a substantive way the tonnage-related problems listed below, assuming that the Option/Variant is adopted and fully implemented.**

<u>Will the Option/Variant resolve:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Reduction of size of crew spaces due to tonnage concerns?	<input type="checkbox"/>				
b. Carriage of more cargo on deck due to tonnage concerns?	<input type="checkbox"/>				
c. Economic disadvantages of open vs. closed containerhips?	<input type="checkbox"/>				
d. Undesirable design features <sup>1</sup> caused by GT/NT rules?	<input type="checkbox"/>				
e. Lack of integrity/uniformity in applying GT/NT rules?	<input type="checkbox"/>				
f. Use of GT, instead of NT, when assessing fees?	<input type="checkbox"/>				

**2. In your opinion, will this Option/Variant cause or lead to the tonnage-related problems listed below, assuming that the Option /Variant is adopted and fully implemented.**

<u>Will the Option/Variant cause or lead to:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Unintended negative impacts on crew <sup>2</sup> ?	<input type="checkbox"/>				
b. Undesirable hull shapes/dimensions to minimize tonnage?	<input type="checkbox"/>				
c. Reduced scantlings/ballast to minimize tonnage?	<input type="checkbox"/>				
d. Lack of integrity/uniform application of the Option/Variant?	<input type="checkbox"/>				
e. Obstacles to innovation in ship design?	<input type="checkbox"/>				
f. An overall decrease in ship safety?	<input type="checkbox"/>				

**3. Please provide your assessment of the viability (in other words, practicality of implementation) of this Option/Variant, by responding to the questions below.**

<u>Will the Option/Variant:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Involve complex or difficult calculations for future ships?	<input type="checkbox"/>				
b. Involve complex or difficult calculations for current ships <sup>3</sup> ?	<input type="checkbox"/>				
c. Require reissuing International Tonnage Certificates?	<input type="checkbox"/>				
d. Require amendment to the Convention to be fully effective?	<input type="checkbox"/>				
e. Have broad appeal?	<input type="checkbox"/>				
f. Generate any major opposition? Provide details on reverse.	<input type="checkbox"/>				
g. Experience widespread use/adoption/implementation?	<input type="checkbox"/>				
h. Change the basis on which fees are assessed?	<input type="checkbox"/>				
i. Allow for maximum flexibility/innovation in ship design?	<input type="checkbox"/>				
j. Improve the overall safety of ships?	<input type="checkbox"/>				

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Notes:

1. Examples include opening of spaces to the sea and weather, and replacing pontoon hatch covers with externally framed covers.
2. An example is crew fatigue due to poor seakeeping characteristics resulting from boxy hull shapes or removal of ballast to optimize tonnage.
3. Consideration should be given to availability of existing data that could be used as a basis for the calculation.

(Questionnaire for Option B: Promote Existing NT Parameter)

**4. Please provide your overall opinion regarding this Option/Variant.**

Strongly Favor

Favor

Neutral

Disfavor

Strongly Disfavor

No Opinion

**5. Benefits / Disadvantages of this Option/Variant** *(Please only list benefits or disadvantages of this Option/Variant that are in addition to those identified in Questions 1-3 of this questionnaire, or that have NOT been previously circulated to this, or prior, correspondence groups).*

**6. Remarks/Comments/Amplification of Responses for this Option/Variant** *(You may also use this space to provide general comments in support of, or opposition to this option/variant, including responses to comments from or concerns raised by other participants. You may attach additional sheets, as necessary)*

**Option C: Establish a third tonnage parameter, adjusted net tonnage (NT<sub>adj</sub>), that includes deck cargo volume.** This proposal seeks to establish a new net tonnage parameter that reflects the volume of deck cargo. Use of a tonnage parameter of this type for assessing fees would have similar advantages to Option B regarding crew accommodation, and would provide equitable treatment for vessels that carry cargo either in interior spaces or on deck. NOTE: for the purpose of completing this questionnaire, assume Option C could be implemented in a similar fashion to Option D (i.e., using a Remark on the International Tonnage Certificate in the absence of an amendment to the TM Convention).

**1. In your opinion, will this Option/Variant resolve in a substantive way the tonnage-related problems listed below, assuming that the Option/Variant is adopted and fully implemented.**

<u>Will the Option/Variant resolve:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Reduction of size of crew spaces due to tonnage concerns?	<input type="checkbox"/>				
b. Carriage of more cargo on deck due to tonnage concerns?	<input type="checkbox"/>				
c. Economic disadvantages of open vs. closed containerships?	<input type="checkbox"/>				
d. Undesirable design features <sup>1</sup> caused by GT/NT rules?	<input type="checkbox"/>				
e. Lack of integrity/uniformity in applying GT/NT rules?	<input type="checkbox"/>				
f. Use of GT, instead of NT, when assessing fees?	<input type="checkbox"/>				

**2. In your opinion, will this Option/Variant cause or lead to the tonnage-related problems listed below, assuming that the Option /Variant is adopted and fully implemented.**

<u>Will the Option/Variant cause or lead to:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Unintended negative impacts on crew <sup>2</sup> ?	<input type="checkbox"/>				
b. Undesirable hull shapes/dimensions to minimize tonnage?	<input type="checkbox"/>				
c. Reduced scantlings/ballast to minimize tonnage?	<input type="checkbox"/>				
d. Lack of integrity/uniform application of the Option/Variant?	<input type="checkbox"/>				
e. Obstacles to innovation in ship design?	<input type="checkbox"/>				
f. An overall decrease in ship safety?	<input type="checkbox"/>				

**3. Please provide your assessment of the viability (in other words, practicality of implementation) of this Option/Variant, by responding to the questions below.**

<u>Will the Option/Variant:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Involve complex or difficult calculations for future ships?	<input type="checkbox"/>				
b. Involve complex or difficult calculations for current ships <sup>3</sup> ?	<input type="checkbox"/>				
c. Require reissuing International Tonnage Certificates?	<input type="checkbox"/>				
d. Require amendment to the Convention to be fully effective?	<input type="checkbox"/>				
e. Have broad appeal?	<input type="checkbox"/>				
f. Generate any major opposition? Provide details on reverse.	<input type="checkbox"/>				
g. Experience widespread use/adoption/implementation?	<input type="checkbox"/>				
h. Change the basis on which fees are assessed?	<input type="checkbox"/>				
i. Allow for maximum flexibility/innovation in ship design?	<input type="checkbox"/>				
j. Improve the overall safety of ships?	<input type="checkbox"/>				

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Notes:

1. Examples include opening of spaces to the sea and weather, and replacing pontoon hatch covers with externally framed covers.
2. An example is crew fatigue due to poor seakeeping characteristics resulting from boxy hull shapes or removal of ballast to optimize tonnage.
3. Consideration should be given to availability of existing data that could be used as a basis for the calculation.

(Questionnaire for Option C: Establish Third Net Tonnage Parameter)

4. Please provide your overall opinion regarding this Option/Variant.

Strongly Favor

Favor

Neutral

Disfavor

Strongly Disfavor

No Opinion

5. **Benefits / Disadvantages of this Option/Variant** *(Please only list benefits or disadvantages of this Option/Variant that are in addition to those identified in Questions 1-3 of this questionnaire, or that have NOT been previously circulated to this, or prior, correspondence groups).*

6. **Remarks/Comments/Amplification of Responses for this Option/Variant** *(You may also use this space to provide general comments in support of, or opposition to this option/variant, including responses to comments from or concerns raised by other participants. You may attach additional sheets, as necessary)*

**Option D: Establish a “maritime real estate” tonnage parameter based on length, breadth and draft.** This proposal seeks to establish an alternative parameter to gross or net tonnage for use in assessing fees. The alternate parameter, referred to as MRE, is based on the ship’s actual maritime real estate (i.e., volume of length x breadth x draught), modified by a factor such that the total aggregate MRE tonnage of the world’s shipping approximately equals the total aggregate gross tonnage (GT) of the world’s shipping. Use of this parameter for assessing fees would lessen the gross tonnage “penalties” for the volumes associated with larger crew accommodation spaces and enclosed cargo spaces (which in turn drive designs to favor larger deck cargo loads).

**1. In your opinion, will this Option/Variant resolve in a substantive way the tonnage-related problems listed below, assuming that the Option/Variant is adopted and fully implemented.**

<u>Will the Option/Variant resolve:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Reduction of size of crew spaces due to tonnage concerns?	<input type="checkbox"/>				
b. Carriage of more cargo on deck due to tonnage concerns?	<input type="checkbox"/>				
c. Economic disadvantages of open vs. closed containerhips?	<input type="checkbox"/>				
d. Undesirable design features <sup>1</sup> caused by GT/NT rules?	<input type="checkbox"/>				
e. Lack of integrity/uniformity in applying GT/NT rules?	<input type="checkbox"/>				
f. Use of GT, instead of NT, when assessing fees?	<input type="checkbox"/>				

**2. In your opinion, will this Option/Variant cause or lead to the tonnage-related problems listed below, assuming that the Option /Variant is adopted and fully implemented.**

<u>Will the Option/Variant cause or lead to:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Unintended negative impacts on crew <sup>2</sup> ?	<input type="checkbox"/>				
b. Undesirable hull shapes/dimensions to minimize tonnage?	<input type="checkbox"/>				
c. Reduced scantlings/ballast to minimize tonnage?	<input type="checkbox"/>				
d. Lack of integrity/uniform application of the Option/Variant?	<input type="checkbox"/>				
e. Obstacles to innovation in ship design?	<input type="checkbox"/>				
f. An overall decrease in ship safety?	<input type="checkbox"/>				

**3. Please provide your assessment of the viability (in other words, practicality of implementation) of this Option/Variant, by responding to the questions below.**

<u>Will the Option/Variant:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Involve complex or difficult calculations for future ships?	<input type="checkbox"/>				
b. Involve complex or difficult calculations for current ships <sup>3</sup> ?	<input type="checkbox"/>				
c. Require reissuing International Tonnage Certificates?	<input type="checkbox"/>				
d. Require amendment to the Convention to be fully effective?	<input type="checkbox"/>				
e. Have broad appeal?	<input type="checkbox"/>				
f. Generate any major opposition? Provide details on reverse.	<input type="checkbox"/>				
g. Experience widespread use/adoption/implementation?	<input type="checkbox"/>				
h. Change the basis on which fees are assessed?	<input type="checkbox"/>				
i. Allow for maximum flexibility/innovation in ship design?	<input type="checkbox"/>				
j. Improve the overall safety of ships?	<input type="checkbox"/>				

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Notes:

1. Examples include opening of spaces to the sea and weather, and replacing pontoon hatch covers with externally framed covers.
2. An example is crew fatigue due to poor seakeeping characteristics resulting from boxy hull shapes or removal of ballast to optimize tonnage.
3. Consideration should be given to availability of existing data that could be used as a basis for the calculation.

(Questionnaire for Variant D1: Establish MRE Tonnage Parameter)

4. Please provide your overall opinion regarding this Option/Variant.

Strongly Favor

Favor

Neutral

Disfavor

Strongly Disfavor

No Opinion

5. **Benefits / Disadvantages of this Option/Variant** *(Please only list benefits or disadvantages of this Option/Variant that are in addition to those identified in Questions 1-3 of this questionnaire, or that have NOT been previously circulated to this, or prior, correspondence groups).*

6. **Remarks/Comments/Amplification of Responses for this Option/Variant** *(You may also use this space to provide general comments in support of, or opposition to this option/variant, including responses to comments from or concerns raised by other participants. You may attach additional sheets, as necessary)*

**Variant D1: Establish an alternate net tonnage parameter calculated by substituting a “maritime real estate” cargo volume based on the vessel’s deadweight tonnage into the existing net tonnage formula.** This proposal seeks to establish an alternate net tonnage parameter reflective of a vessel’s “seawater equivalent net tonnage” with the recommendation that fees be assessed using the larger of: 1) the alternate parameter, or 2) the existing net tonnage parameter. The alternate parameter, referred to as NT<sub>DWT</sub>, is calculated by substituting the volume associated with the vessel’s deadweight tonnage (expressed in metric tons of seawater) for the total volume of all cargo spaces (V<sub>c</sub>) in the existing net tonnage formula. For some types of vessels (e.g., heavy lift), NT<sub>DWT</sub> may yield higher tonnages than the current NT parameter. Assessing fees based on this parameter for such vessels removes the incentive to minimize crew spaces and maximize the amount of deck cargo carried relative to internal cargo.

**1. In your opinion, will this Option/Variant resolve in a substantive way the tonnage-related problems listed below, assuming that the Option/Variant is adopted and fully implemented.**

<u>Will the Option/Variant resolve:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Reduction of size of crew spaces due to tonnage concerns?	<input type="checkbox"/>				
b. Carriage of more cargo on deck due to tonnage concerns?	<input type="checkbox"/>				
c. Economic disadvantages of open vs. closed containerhips?	<input type="checkbox"/>				
d. Undesirable design features <sup>1</sup> caused by GT/NT rules?	<input type="checkbox"/>				
e. Lack of integrity/uniformity in applying GT/NT rules?	<input type="checkbox"/>				
f. Use of GT, instead of NT, when assessing fees?	<input type="checkbox"/>				

**2. In your opinion, will this Option/Variant cause or lead to the tonnage-related problems listed below, assuming that the Option /Variant is adopted and fully implemented.**

<u>Will the Option/Variant cause or lead to:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Unintended negative impacts on crew <sup>2</sup> ?	<input type="checkbox"/>				
b. Undesirable hull shapes/dimensions to minimize tonnage?	<input type="checkbox"/>				
c. Reduced scantlings/ballast to minimize tonnage?	<input type="checkbox"/>				
d. Lack of integrity/uniform application of the Option/Variant?	<input type="checkbox"/>				
e. Obstacles to innovation in ship design?	<input type="checkbox"/>				
f. An overall decrease in ship safety?	<input type="checkbox"/>				

**3. Please provide your assessment of the viability (in other words, practicality of implementation) of this Option/Variant, by responding to the questions below.**

<u>Will the Option/Variant:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Involve complex or difficult calculations for future ships?	<input type="checkbox"/>				
b. Involve complex or difficult calculations for current ships <sup>3</sup> ?	<input type="checkbox"/>				
c. Require reissuing International Tonnage Certificates?	<input type="checkbox"/>				
d. Require amendment to the Convention to be fully effective?	<input type="checkbox"/>				
e. Have broad appeal?	<input type="checkbox"/>				
f. Generate any major opposition? Provide details on reverse.	<input type="checkbox"/>				
g. Experience widespread use/adoption/implementation?	<input type="checkbox"/>				
h. Change the basis on which fees are assessed?	<input type="checkbox"/>				
i. Allow for maximum flexibility/innovation in ship design?	<input type="checkbox"/>				
j. Improve the overall safety of ships?	<input type="checkbox"/>				

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Notes:

1. Examples include opening of spaces to the sea and weather, and replacing pontoon hatch covers with externally framed covers.
2. An example is crew fatigue due to poor seakeeping characteristics resulting from boxy hull shapes or removal of ballast to optimize tonnage.
3. Consideration should be given to availability of existing data that could be used as a basis for the calculation.

(Questionnaire for Variant D1: MRE Tonnage Based on Block Coefficient / Vessel Type)

4. Please provide your overall opinion regarding this Option/Variant.

Strongly Favor

Favor

Neutral

Disfavor

Strongly Disfavor

No Opinion

5. **Benefits / Disadvantages of this Option/Variant** *(Please only list benefits or disadvantages of this Option/Variant that are in addition to those identified in Questions 1-3 of this questionnaire, or that have NOT been previously circulated to this, or prior, correspondence groups).*

6. **Remarks/Comments/Amplification of Responses for this Option/Variant** *(You may also use this space to provide general comments in support of, or opposition to this option/variant, including responses to comments from or concerns raised by other participants. You may attach additional sheets, as necessary)*

**Variant D2: Establish a “maritime real estate” tonnage parameter based on length, breadth, draft, block coefficient, and vessel type.** This proposal seeks to establish an alternative parameter to gross or net tonnage for use in assessing fees. The alternate parameter, referred to as  $GT_{Cb}$ , is based on the ship’s actual maritime real estate (i.e., volume of length x breadth x draught) modified by both the vessel’s block coefficient and a conversion factor calculated using maritime real estate values, block coefficients and gross tonnages for existing vessels of a similar type. It would be assigned to new vessels as an alternate for the GT parameter: current vessels would not be assigned  $GT_{Cb}$ . Use of this parameter for assessing fees would lessen the gross tonnage “penalty” for the volume associated with larger crew accommodation spaces and enclosed cargo spaces (which in turn drive designs to favor larger deck cargo loads).

**1. In your opinion, will this Option/Variant resolve in a substantive way the tonnage-related problems listed below, assuming that the Option/Variant is adopted and fully implemented.**

<u>Will the Option/Variant resolve:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Reduction of size of crew spaces due to tonnage concerns?	<input type="checkbox"/>				
b. Carriage of more cargo on deck due to tonnage concerns?	<input type="checkbox"/>				
c. Economic disadvantages of open vs. closed containerhips?	<input type="checkbox"/>				
d. Undesirable design features <sup>1</sup> caused by GT/NT rules?	<input type="checkbox"/>				
e. Lack of integrity/uniformity in applying GT/NT rules?	<input type="checkbox"/>				
f. Use of GT, instead of NT, when assessing fees?	<input type="checkbox"/>				

**2. In your opinion, will this Option/Variant cause or lead to the tonnage-related problems listed below, assuming that the Option /Variant is adopted and fully implemented.**

<u>Will the Option/Variant cause or lead to:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Unintended negative impacts on crew <sup>2</sup> ?	<input type="checkbox"/>				
b. Undesirable hull shapes/dimensions to minimize tonnage?	<input type="checkbox"/>				
c. Reduced scantlings/ballast to minimize tonnage?	<input type="checkbox"/>				
d. Lack of integrity/uniform application of the Option/Variant?	<input type="checkbox"/>				
e. Obstacles to innovation in ship design?	<input type="checkbox"/>				
f. An overall decrease in ship safety?	<input type="checkbox"/>				

**3. Please provide your assessment of the viability (in other words, practicality of implementation) of this Option/Variant, by responding to the questions below.**

<u>Will the Option/Variant:</u>	Yes	Possibly	No	No Opinion	Not Applicable
a. Involve complex or difficult calculations for future ships?	<input type="checkbox"/>				
b. Involve complex or difficult calculations for current ships <sup>3</sup> ?	<input type="checkbox"/>				
c. Require reissuing International Tonnage Certificates?	<input type="checkbox"/>				
d. Require amendment to the Convention to be fully effective?	<input type="checkbox"/>				
e. Have broad appeal?	<input type="checkbox"/>				
f. Generate any major opposition? Provide details on reverse.	<input type="checkbox"/>				
g. Experience widespread use/adoption/implementation?	<input type="checkbox"/>				
h. Change the basis on which fees are assessed?	<input type="checkbox"/>				
i. Allow for maximum flexibility/innovation in ship design?	<input type="checkbox"/>				
j. Improve the overall safety of ships?	<input type="checkbox"/>				

(continued on next page)

Notes:

1. Examples include opening of spaces to the sea and weather, and replacing pontoon hatch covers with externally framed covers.
2. An example is crew fatigue due to poor seakeeping characteristics resulting from boxy hull shapes or removal of ballast to optimize tonnage.
3. Consideration should be given to availability of existing data that could be used as a basis for the calculation.

(Questionnaire for Variant D2: MRE Tonnage Based on Deadweight)

**4. Please provide your overall opinion regarding this Option/Variant.**

Strongly Favor  Favor  Neutral  Disfavor  Strongly Disfavor  No Opinion

**5. Benefits / Disadvantages of this Option/Variant** *(Please only list benefits or disadvantages of this Option/Variant that are in addition to those identified in Questions 1-3 of this questionnaire, or that have NOT been previously circulated to this, or prior, correspondence groups).*

**6. Remarks/Comments/Amplification of Responses for this Option/Variant** *(You may also use this space to provide general comments in support of, or opposition to this option/variant, including responses to comments from or concerns raised by other participants. You may attach additional sheets, as necessary)*