



Rollie Herman

This is a Comment on the **Coast Guard (USCG) Notice: Meetings: Commercial Fishing Safety Advisory Committee (Federal Register Publication)**

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Comment

Department of Homeland Security Docket Number USCG-2015-0673

The new regulations bring parity between Federally Documented and State Registered vessels with regards to life rafts. It is unclear if these regulations will force State Registered vessels that are currently equipped with an Inflatable Buoyant Apparatus (IBA) to upgrade (for example) to a SOLAS A raft if they fished in cold waters outside of 50 miles.

In the past the USCG has allowed for existing, still approved, equipment to be "grandfathered" in for the life of that piece of gear. We saw that when the original fishing vessel regulations were put in place where life rafts that were not USCG approved could still be used providing the raft manufacturer had an approved manual. When we transitioned from 160.051 rafts to 160.151 models, the older rafts were also allowed to be carried for their service life.

The implementation date of these new regulations is fast approaching and owners of State Registered vessels are still purchasing IBA's believing that they will meet their carriage requirement regardless of where they fish.

I am not advocating for "grandfathering" but for clarity on this issue. Those of us who supply the commercial fishing industry need to be able to provide accurate information to our customers.

Sincerely,
Rollie Herman, President
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