



May 21, 2008

Via EMail: [shipstrike.comments@noaa.gov](mailto:shipstrike.comments@noaa.gov) & Fax: 301-713-0376

Chief, Marine Mammal Conservation Division  
Attn: Right Whale Ship Strike Strategy  
Office of Protected Resources  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, MD 20910

Via Email: [David.Rostker@omb.eop.gov](mailto:David.Rostker@omb.eop.gov) & Fax: 202-395-3080

Mr. David Rostker  
Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

**RE: Endangered Fish and Wildlife: Proposed Rulemaking to Implement Speed Restrictions to Reduce the Threat of Ship Collisions with North Atlantic Right Whales (Docket No. 040506143-6016-02.I.D.101205B; RIN 0648-AS36; Federal Register, June 26, 2006, pages 36299 – 36313)**

Dear Sirs:

The Chamber of Shipping of America (Chamber) continues to hear comments that the industry is divided with regard to the referenced proposed rule and specifically that the Chamber's comments submitted in our August 24, 2006 statement into the Docket represent other than what they truly are. We are writing to you to clarify and restate our position which is fully consistent with the other industry comments that have been submitted.

The Chamber represents 31 U.S.-based companies that own, operate or charter oceangoing tankers, container ships, and other merchant vessels engaged in both the domestic and international trades. The Chamber also represents other entities that maintain a commercial interest in the operation of such oceangoing vessels.

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There are two significant points in our position:

1. We do not believe the science supports speed reductions below 14 knots as being any more (or less) advantageous to the survival of the North Atlantic Right Whale; and, we support implementation of a 14 knot speed limit with higher speed exceptions based on unique local conditions in the covered areas during the seasonal periods outlined in the proposed rule. We do not support implementation of a speed restriction below 14 knots as we believe this places the safety of the ships, their crew and the environment unnecessarily at risk.

Please feel free to contact either of the undersigned if additional clarification of this position is desired.

Sincerely,

Sincerely,



Joseph J. Cox  
President



Michael T. Bohlman  
Chairman