

CFSAC REGULATORY REFORM SUBCOMMITTEE RECOMMENDATION REPORT

SUBJECT: EVALUATION OF EXISTING COAST GUARD REGULATIONS, GUIDANCE DOCUMENTS, INTERPRETATIVE DOCUMENTS, AND COLLECTIONS OF INFORMATION

IDENTIFICATION DETAILS OF REGULATION, GUIDANCE OR INFORMATION COLLECTION (BY SECTION, PARAGRAPH, SENTENCE, CLAUSE, ETC.):

- Existing regulation
- Proposed regulation
- Guidance
- Collection of information

46 CFR §28.200 Applicability; documentation of maintenance, training, and drills.

(b) The individual in charge of a vessel described in paragraph (a) of this section must keep a record of equipment maintenance, and required instruction and drills for three years.

ADVICE AND RECOMMENDATIONS:

- Repeal
- Replace
- Modification

Regulations should ensure the master or individual in charge of a vessel keep a record of the inspection and maintenance for each item of lifesaving equipment, carried on board a vessel to meet the requirements of this 46 CFR Part 28. The required record of equipment maintenance should include the date and time of the equipment inspection or maintenance, the person's name performing the equipment inspection or maintenance, the inspection and maintenance procedure(s) performed, the equipment's operational readiness status, any further maintenance or repair required to

make the equipment operationally ready, and the date, time and person performing any further or follow-up maintenance or repair.

Regulations should ensure the master or individual in charge of a vessel must keep a record of the drills and instruction required by 46 CFR Part 28. The required record of the drills and instruction should include (a) the date and time of the drill or instruction, (b) the person's name giving the instruction, leading a discussion concerning the contingencies listed in 46 CFR §28.270 paragraph (a), or conducting the drill, (c) the names of those receiving the instruction, watching video and participating in discussion or participating in the drill, and (d) the topic(s) of the instruction, the topic of the video watched and discussion, or a description of the drill scenario.

IF MODIFICATION - SPECIFIC RECOMMENDATIONS FOR HOW THE REGUALTION, GUIDANCE, OR INFORMATION COLLECTION SHOULD BE MODIFIED:

N/a

HOW AND TO WHAT EXTENT REPEAL, REPLACEMENT OR MODIFICATION WILL REDUCE COSTS OR BURDENS TO INDUSTRY:

Types of costs – mark all that apply

- Costs that are outdated or are no longer necessary
- Costs which are no longer enforced as written or which are ineffective
- Costs tied to reporting or recordkeeping requirements that impose burdens that exceed benefits (explain why the reporting or recordkeeping requirement is overly burdensome, unnecessary, or how it could be modified)

N/a

THE EXTENT TO WHICH RISKS TO HEALTH OR SAFETY WOULD LIKELY INCREASE:

Risks to health and safety will likely decrease significantly as the requirement to keep a record of equipment maintenance, required instruction and drills increases accountability, drill and instruction frequency, and crew situational awareness.

HOW AND TO WHAT EXTENT THE REGULATION, GUIDANCE, OR INFORMATION COLLECTION HAS LED TO THE ELIMINATION OF JOBS OR INHIBITS JOB CREATION:

N/a

PROVIDE QUANTITATIVE AND/OR QUALITATIVE DATA TO SUPPORT AND ILLUSTRATE THE IMPACT, COST, OR BURDEN, AS APPLICABLE. IF THE DATA IS NOT READILY AVAILABLE INCLUDE INFORMATION AS TO HOW SUCH INFORMATION CAN BE OBTAINED BY THE COMMITTEE OR THE COAST GUARD

N/a