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January 24, 2005

Office of Technical and Information Services
Architectural and Transportation Barriers Compliance Board
1331 F Street, Northwest
Suite 1000
Washington, District of Columbia 20004-1111

To Whom It May Concern:

On behalf of the members of the National Marine Charter Association (NMCA) and the National Marine Manufacturers Association (NMMA), we hereby request a 90-day extension of the comment period for the Access Board's Advance Notice of Proposed Rulemaking (ANPRM) on Americans with Disabilities Act (ADA) Accessibility Guidelines for Small Passenger Vessels.

In order to offer comprehensive comments, our industries require more time to review the text of the draft guidelines, particularly in light of the Access Board's significant departure from the Passenger Vessel Access Advisory Council's (PVAAC) recommendations.

The charter industry utilizes a wide variety of vessels from a wide variety of boat manufacturers and we require additional time to compile information about how these recommendations would affect both manufacturers and operators. NMCA and NMMA want to help the Access Board understand the difficulties we see in adopting the proposed guidelines, and our particular concern for extending the large vessel guidelines to small passenger vessels.

When the Access Board's documents were published in the *Federal Register* on the day after Thanksgiving, NMCA and NMMA immediately alerted their memberships. As mentioned in other comments, the timing did not allow us, or our members, to focus on the proposals until after the first of the year. In addition to the holidays, the comment period falls during the hectic boat show season making boat manufacturers and operators largely unavailable.

Furthermore, while the Access Board has been working on this issue for a number of years, neither of our industries has been involved in this process until now. Indeed, the PVAAC committee did not include any representative from the recreational or charter boating communities.

We also request that a second public meeting be scheduled. In addition to the reasons stated above, we believe that the Access Board was provided with new information at the initial public hearing about the affects of these standards on the many different segments of the marine industry. Another public hearing will allow the Access Board members time to explore these issues and prepare additional questions of industry representatives. NMCA and NMMA will plan to testify at that meeting, and can plan to have charter operators and vessel manufacturers attend to make additional comments.

We plan to make a similar request of the Department of Transportation regarding their related proposals.

NMCA and NMMA appreciate this opportunity to comment on this proposal. If you have questions about this request, please feel free to contact NMCA's Melissa Moskal at 703.519.1714 or NMMA's Cindy Squires at 202.737.9766.

Sincerely,
Melissa Moskal
Executive Director, NMCA

Cindy Squires
Regulatory Counsel, NMMA