

ORIGINAL

64155

JOHN A. SHANNON
302 SHORT RD.
VENICE, FL 34285
(941) 484-3476

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-401, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

DEPT. OF TRANSPORTATION
DOCKETS
99 SEP 20 PM 12:21

REF: DOCKET No. MARAD-1999-6 17 1 - 298
Liquid Natural Gas (LNG) Vessels

Date:

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

reflagging maneuver. In essence, by approving the reflagging application, you will also be tearing up our collective bargaining agreement.

- B) According to the MARAD mission statement, “The overall mission of the Maritime Administration, in accordance with the policies set forth in the Merchant Marine Act, 1936, as amended, and related shipping statutes, is to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry the Nation’s domestic waterborne commerce and a substantial portion of its waterborne foreign commerce. . . .”. Obviously you will not be adhering to the 1936 Merchant Marine Act if you allow 100% of the U.S. flag LNG ship fleet to be reflagged. This effectively removes the ability of the U.S. to participate in worldwide LNG trade and all potential participation in our own rapidly expanding U.S. foreign LNG trade.

If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carrya substantial portion of its waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

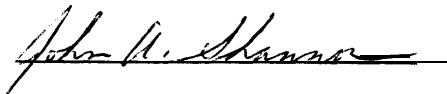
- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

- D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a *maximum* (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial U.S. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore, because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the immediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,



Thomas Siwanski

Thomas Siwaski
3 Vin Smith Ave
Aston, PA 19014

(610)-494-0845

The Honorable Clyde Hart
Maritime Administrator
U. S. Maritime Administration
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U.S. DOT Dockets
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Washington, DC 20590

DEPT. OF TRANSPORTATION
DOCKETS
99 SEP 20 PM 12:27

REF: DOCKET No. MARAD-1999-6 17 1
Liquid Natural Gas (LNG) Vessels

Date: 9/15/99

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

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If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry a substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

- D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a maximum (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial U.S. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore, because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the immediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,



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Maritime Administrator
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Room PL-40 1, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

*22211 Vobe Ct
Katy Tx 77449*

REF: DOCKET No. MARAD-1999-6171
Liquid Natural Gas (LNG) Vessels

Date: *13 Sept. 1999*

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

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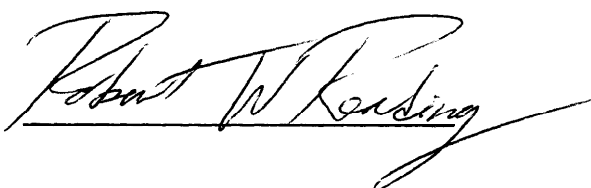
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Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Robert W. Reading". The signature is written in black ink and is positioned above a horizontal line.

99 SEP 20 PM 12: 27

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
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Room PL-40 1, Nassif Building
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400 Seventh Street, SW
Washington, DC 20590

REF: DOCKET No. MARAD-1999-6171
Liquid Natural Gas (LNG) Vessels

Date: 9 Sep 99

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

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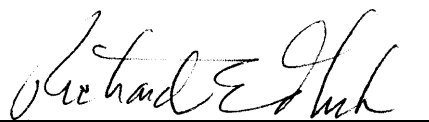
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to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

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Respectfully submitted,



9 Sep 1999

Sen. Joe Biden
US Senate
Washington DC

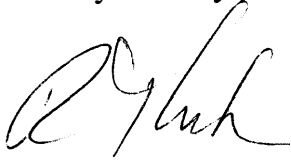
Joe

Just a short note to register a concern regarding a plan to remove the US flag from a group of ships now engaged in the Liquid Natural Gas industry.

These ships were built with assistance of US taxpayers and are no manned by US citizens who pay US taxes and contribute in a positive way towards the balance of payments.

I do not think it is in our countries best interest to support this reflagging proposal

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'R. Thek', written in a cursive style.

Richard Thek

410 William St
Seaford DE 19973

PS. See attached letter being forwarded by people to the US Maritime Administration. .

99 SEP 20 PM 12: 26

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-401, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

REF: DOCKET No. MARAD- 1999-6 17 1
Liquid Natural Gas (LNG) Vessels

Date: 14 Sept 99

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

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Respectfully submitted,

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The Honorable Clyde Hart
Maritime Administrator
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400 Seventh Street, SW
Washington, DC 20590

Richard A Sullivan
1265 Lorraine Ave
Teaneck N.J.
07666

DEPT. OF TRANSPORTATION
DOCKETS

09 SEP 20 PM 12:25

REF: DOCKET No. MARAD-1999-6171
Liquid Natural Gas (LNG) Vessels

Date: *Sept. 14, 1999*

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- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

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- B) According to the MARAD mission statement, “The overall mission of the Maritime Administration, in accordance with the policies set forth in the Merchant Marine Act, 1936, as amended, and related shipping statutes, is to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry the Nation’s domestic waterborne commerce and a substantial portion of it’s waterborne foreign commerce. . . .”. Obviously you will not be adhering to the 1936 Merchant Marine Act if you allow 100% of the U.S. flag LNG ship fleet to be reflagged. This effectively removes the ability of the U.S. to participate in worldwide LNG trade and all potential participation in our own rapidly expanding U.S. foreign LNG trade.

If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carrya substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

- D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a maximum (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial U.S. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore, because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the immediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,

Richard A. Sullivan

c/o The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
Docket Clerk
U.S. DOT Dockets
Room PL-401, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

GARY W. HILL
491 ERIN GANTH
SEVERNA PARK, MD
21146

DEPT. OF TRANSPORTATION
DOCKETS
50 SEP 2 PM 10:25

REF: DOCKET No. MARAD-1 999-6171
Liquid Natural Gas (LNG) Vessels

Date: 7/14/97

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

reflagging maneuver. In essence, by approving the reflagging application, you will also be tearing up our collective bargaining agreement.

- B) According to the MARAD mission statement, “The overall mission of the Maritime Administration, in accordance with the policies set forth in the Merchant Marine Act, 1936, as amended, and related shipping statutes, is to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry the Nation’s domestic waterborne commerce and a substantial portion of it’s waterborne foreign commerce. . . .”. Obviously you will not be adhering to the 1936 Merchant Marine Act if you allow 100% of the U.S. flag LNG ship fleet to be reflagged. This effectively removes the ability of the U.S. to participate in worldwide LNG trade and all potential participation in our own rapidly expanding U.S. foreign LNG trade.

If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carrya substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

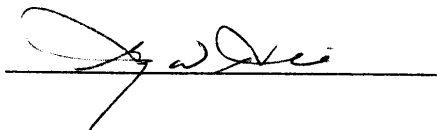
- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

- D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a maximum (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial U.S. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore? because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the irnmediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. W. Davis", is written over a horizontal line.

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-40 1, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

EVANS C. ROBERTS
3542 CARRIAGE HILL CIR #101
RANDALLSTOWN, MD 21133

REF: DOCKET No. MARAD-1999-6 171
Liquid Natural Gas (LNG) Vessels

DEPT. OF TRANSPORTATION
DOCKETS
09 SEP 20 PM 12:25

Date: 9/14/99

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

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- B) According to the MARAD mission statement, “The overall mission of the Maritime Administration, in accordance with the policies set forth in the Merchant Marine Act, 1936, as amended, and related shipping statutes, is to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry the Nation’s domestic waterborne commerce and a substantial Portion of it’s waterborne foreign commerce. . . .”. Obviously you will not be adhering to the 1936 Merchant Marine Act if you allow 100% of the U.S. flag LNG ship fleet to be reflagged. This effectively removes the ability of the U.S. to participate in worldwide LNG trade and all potential participation in our own rapidly expanding U.S. foreign LNG trade.

If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carrya substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

- D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a *maximum* (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial U.S. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore, because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the immediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,

Ervin C. Robert

12149 J Herwick
29676 Lakeview Ct.
Easton, MD 21601

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-401, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

DEPT. OF TRANSPORTATION
DOCKETS
99 SEP 20 PM 12:05

REF: DOCKET No. MARAD-1999-6171
Liquid Natural Gas (LNG) Vessels

Date: Sept. 15, 1999

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

reflagging maneuver. In essence, by approving the reflagging application, you will also be tearing up our collective bargaining agreement.

- B) According to the MARAD mission statement, “The overall mission of the Maritime Administration, in accordance with the policies set forth in the Merchant Marine Act, 1936, as amended, and related shipping statutes, is to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry the Nation’s domestic waterborne commerce and a substantial portion of it’s waterborne foreign commerce. . . .”. Obviously you will not be adhering to the 1936 Merchant Marine Act if you allow 100% of the U.S. flag LNG ship fleet to be reflagged. This effectively removes the ability of the U.S. to participate in worldwide LNG trade and all potential participation in our own rapidly expanding U.S. foreign LNG trade.

If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carrya substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

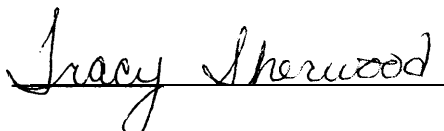
- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

- D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a *maximum* (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial U.S. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore, because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the immediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,

A handwritten signature in cursive script that reads "Tracy Sherwood". The signature is written in black ink and is positioned above a horizontal line.

DEPT. OF TRANSPORTATION
DOCKETS

99 SEP 20 PM 10: 26

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-40 1, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

22211 Vobe Court
Katy, Tx 77449

REF: DOCKET No. MARAD- 1999-6 171
Liquid Natural Gas (LNG) Vessels

Date: 9/12/99

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

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If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carrya substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

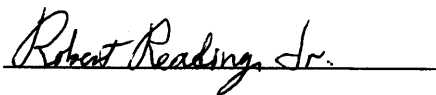
- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

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In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,

Robert Reading, Jr.

DEPT. OF TRANSPORTATION
DOCKETS

99 SEP 20 PM 12: 25

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-40 1, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

*10 Loma Vista
Vallejo, CA 94590*

REF: DOCKET No. MARAD- 1999-6 17 1
Liquid Natural Gas (LNG) Vessels

Date: *13 Sept 1999*

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

reflagging maneuver. In essence, by approving the reflagging application, you will also be tearing up our collective bargaining agreement.

- B) According to the MARAD mission statement, “The overall mission of the Maritime Administration, in accordance with the policies set forth in the Merchant Marine Act, 1936, as amended, and related shipping statutes, is to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry the Nation’s domestic waterborne commerce and a substantial portion of it’s waterborne foreign commerce. . . .”. Obviously you will not be adhering to the 1936 Merchant Marine Act if you allow 100% of the U.S. flag LNG ship fleet to be reflagged. This effectively removes the ability of the U.S. to participate in worldwide LNG trade and all potential participation in our own rapidly expanding U.S. foreign LNG trade.

If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry a substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

- D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a maximum (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial U.S. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore, because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the immediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,



The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-40 1, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

RICHARD L. ROSETTA
3648 BONNIE LANE
LINKWOOD MD. 21835

DEPT. OF TRANSPORTATION
DOCKETS
99 SEP 20 PM 10:25

REF: DOCKET No. MARAD-1999-6171
Liquid Natural Gas (LNG) Vessels

Date: 9-14-99

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

reflagging maneuver. In essence, by approving the reflagging application, you will also be tearing up our collective bargaining agreement.

- B) According to the MARAD mission statement, “The overall mission of the Maritime Administration, in accordance with the policies set forth in the Merchant Marine Act, 1936, as amended, and related shipping statutes, is to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry the Nation’s domestic waterborne commerce and a substantial portion of it’s waterborne foreign commerce....”. Obviously you will not be adhering to the 1936 Merchant Marine Act if you allow 100% of the U.S. flag LNG ship fleet to be reflagged. This effectively removes the ability of the U.S. to participate in worldwide LNG trade and all potential participation in our own rapidly expanding U.S. foreign LNG trade.

If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carrya substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

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In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Bud Rose", is written over a horizontal line.

MICHAEL P. ROBERTS
1622 TOWNSEND SACKMAN RD.
COLVILLE, WASH. 99114

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-40 1, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

DEPT. OF TRANSPORTATION
DOCKETS
99 SEP 20 PM 12:25

REF: DOCKET No. MARAD-1999-6171
Liquid Natural Gas (LNG) Vessels

Date: 6/16

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

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If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carrya substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

- D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a *maximum* (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial US. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore, because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the immediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,



Louis R. Holtz
3218 Canterbury Lane
Falkton Md 21047
410-692-0755

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-401, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

DEPT. OF TRANSPORTATION
DOCKETS
99 SEP 20 PM 12:25

REF: DOCKET No. MARAD-1999-6 17 1
Liquid Natural Gas (LNG) Vessels

Date:

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

reflagging maneuver. In essence, by approving the reflagging application, you will also be tearing up our collective bargaining agreement.

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If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry a substantial portion of its waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

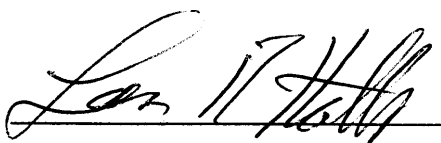
- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

- D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a *maximum* (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial U.S. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore, because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the immediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Len J. Hall", written over a horizontal line.

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-40 1, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

ROBERT V. BRADLEY
3909 TOWNSEND PT. RD
PORTSMOUTH VA 23703

DEPT. OF TRANSPORTATION
DOCKET #
99 SEP 20 PM 12:25

REF: DOCKET No. MARAD-1999-6171
Liquid Natural Gas (LNG) Vessels

Date: 9/13/99

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

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If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry a substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

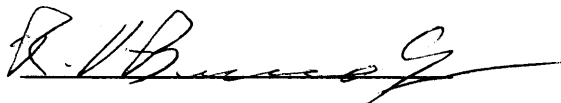
- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

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Respectfully submitted,



REBECCA GUYTON
2309 AUSTIN DR.
WILMINGTON, DE 19808

DEPT. OF TRANSPORTATION
DOCKETS

59 SEP 20 PM 12:25

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-40 1, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

REF: DOCKET No. MARAD-1999-6171
Liquid Natural Gas (LNG) Vessels

Date: 9/14/99

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

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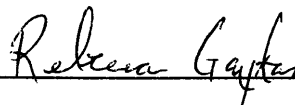
- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

- D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a *maximum* (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial U.S. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore, because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the immediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,



F. Andrew Wysocki
2309 Austin Dr.
Wilmington, DE 19808

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-401, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

DEPT. OF TRANSPORTATION
DOCKETS
99 SEP 20 PM 12:23

REF: DOCKET No. MARAD-1999-6171
Liquid Natural Gas (LNG) Vessels

Date: 9/1/99

Dear Administrator Hart,

As a U.S. merchant marine officer and active member of the MEBA, I am writing to urge you NOT to allow the reflagging of the eight last remaining LNG tank ships under U.S. flag for all of the following reasons:

- A) There is an existing collective bargaining agreement between MEBA and Pronav, covering all of the U.S. officers aboard these operating LNG ships, which is currently in effect until 15 June of 2001. Approval of the reflagging under this circumstance can only be interpreted as a grievous affront to the MEBA U.S. licensed officers working under this active collective bargaining agreement, as they will quickly lose their jobs if the reflagging request is approved by you. The officers on these LNG ships chose to be represented by our union, MEBA, for the past twenty-three years. This choice cannot be ignored in your analysis of whether this serves the interests of the U.S. merchant marine. It is totally unwarranted and improper for MARAD to assist in this overt attempt, by foreign controlled owners and operators of these eight LNG ships, to force U.S. labor organization represented (MEBA) members from their jobs or union by this

reflagging maneuver. In essence, by approving the reflagging application, you will also be tearing up our collective bargaining agreement.

- B) According to the MARAD mission statement, “The overall mission of the Maritime Administration, in accordance with the policies set forth in the Merchant Marine Act, 1936, as amended, and related shipping statutes, is to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carry the Nation’s domestic waterborne commerce and a substantial portion of it’s waterborne foreign commerce. . . .”. Obviously you will not be adhering to the 1936 Merchant Marine Act if you allow 100% of the U.S. flag LNG ship fleet to be reflagged. This effectively removes the ability of the U.S. to participate in worldwide LNG trade and all potential participation in our own rapidly expanding U.S. foreign LNG trade.

If these eight actively trading ships are allowed to be reflagged, it will also mean the immediate removal of over 8 % of our whole existing active oceangoing U.S. merchant marine foreign trade fleet from the U.S. flag. Since our overall numbers of U.S. flag ships participating in foreign trade is less than a total of 100 ships, and we carry less than 2.7% of our own foreign trade, the reflagging of these eight LNG ships cannot possibly serve “to promote the development and maintenance of an adequate, well-balanced, United States merchant marine, sufficient to carrya substantial portion of it’s waterborne foreign commerce”. Two of the eight LNG ships will be participating in worldwide charter trade opportunities, which means that like their recently reflagged sister ships, the LOUISIANA and the LAKE CHARLES, they will very likely be carrying LNG cargoes to one or more of the four LNG receiving terminals here in the U.S. or perhaps, even export cargoes from our LNG terminal in Alaska. What possible benefit is it to U.S. interests to allow a foreign controlled corporation to completely take away all U.S. flag LNG carriage capability?

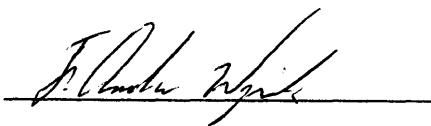
- C) U.S. taxpayers’ money was used in the development and construction of these LNG ships, and was also placed at risk for the mortgage guarantees. Why should foreign controlled interests now be allowed to remove these LNG ships from the U.S. flag? That is an insult to every U.S. taxpaying citizen. It also removes one more of the few remaining assets that allows the U.S. to have some economic participation into our own foreign commerce. The loss of these long-term U.S. merchant marine jobs to the Nation may be miniscule when compared to the whole U.S. economy, but when compared

to the benefit derived from the knowledge, as well as wages, within our seagoing maritime sector, it becomes a significantly sized loss that our nation's maritime skills base can ill afford.

D) In the best case U.S. officer employment scenario, according to Pronav's announced plans, a *maximum* (probably not attainable from Pronav's alternative U.S. labor sources) of only eight U.S. officers will be employed after the reflagging on just six of the eight ships. The other two ships will be completely foreign manned. Pronav is only publicly committing to such partial U.S. employment until 2004, with announced contractual clauses allowing them to reduce even that. And since they are only the hired operator of the ships, they cannot even guarantee that short length of reduced employment. Furthermore, because of the major reduction they are allowing in officer's time off from the ship, the foreign controlled employers will only be using three complements of eight U.S. officers for every two ships instead of the normal four complements of eleven U.S. officers for two ships. Therefore, the immediate U.S. officer job loss will be 60 %. The U.S. merchant marine currently offers no alternative shipboard jobs for those skilled and experienced LNG officers that are to be displaced by this new mixture of foreign and inexperienced American personnel. What is the supportive U.S. national merchant marine policy objective that is being attained if MARAD aids a foreign controlled company to take away the jobs of presently employed U.S. officers on eight ships currently flying the U.S. flag?

In closing, once again I am respectfully requesting you to use the power of your office to protect the U.S. flagged merchant marine from this extremely significant loss of jobs, knowledge, LNG trade capability, and specific LNG carriage technology. A decision to approve the reflagging of our last remaining LNG ships can only have an extremely negative impact upon our total maritime ability to compete with the rest of the world.

Respectfully submitted,



ROBERT J. LEE
2660 MYRTLE AVE
PRESTON, MD, 21655

The Honorable Clyde Hart
Maritime Administrator
U.S. Maritime Administration
c/o Docket Clerk
U.S. DOT Dockets
Room PL-401, Nassif Building
Department of Transportation
400 Seventh Street, SW
Washington, DC 205 90

DEPT. OF TRANSPORTATION
DOCKETS
59 SEP 20 11 13 20

REF: DOCKET No. MARAD-1999-6171
Liquid Natural Gas (LNG) Vessels

Date: 9/14/99

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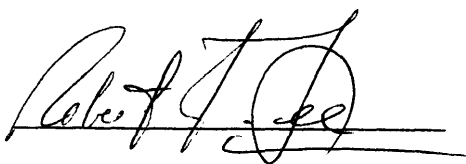
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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert J. Lee", with a horizontal line underneath.