

31. *Security Training, Drills and Exercises for Facility Personnel.* In the notice of public meeting we requested comments on whether we should require facility security personnel to attend formal training. We discussed the concept of allowing the Facility Security Officer to certificate security officers and train the facility personnel in accordance with the requirements. We also asked if prescribing the format for training records would assist the companies.

Several commenters recommended that we provide specific guidance on the type of information that should be recorded, but not require a specific format for the recordkeeping. Other commenters stated that the drill and exercise requirements were excessive.

As previously stated, there are no approved courses for facility personnel. In the absence of approved formal training, we intend to allow Facility Security Officers to certify that personnel holding a security position have received the training required to fulfill their security duties.

When training is developed, we will reassess the training and certification requirements in the Facility Security interim rule found in today's **Federal Register**. We will then propose alternatives or additional requirements in a separate rulemaking, as appropriate.

We have included the specific requirements in the Facility Security interim rule, found in today's **Federal Register**, on what type of information must be kept, with the facility owner or operator deciding what format and where the records will be kept.

We believe it is imperative that exercises and drills be conducted to ensure security plans are current and that the personnel are familiar with their responsibilities. We also believe that the Facility Security Officer's participation in exercises is critical to improving security. Therefore, we have included exercise and drill requirements in the Facility Security interim rule found in today's **Federal Register**. Security drills and exercises can be incorporated into existing response exercises and drills and we believe that by combining exercises, when possible, the exercises and drilling requirements can be made more efficient.

32. *Certification for Facilities.* In the notice of meeting, we requested suggestions for verification and certification that facilities do comply with the security regulations. We also asked whether we should allow companies to certify their facilities.

A large number of commenters stated that self-certification which reflects a

current industry standard and has an independent audit would be appropriate. Other commenters supported the role of the Coast Guard in oversight during the certification process.

We intend to approve all facility security plans and compliance with the requirements in the Facility Security Interim rule found in today's **Federal Register**. We believe certification and verification can be accomplished during a Coast Guard Inspection and the facility's plan approval letter sufficiently documents compliance when viewed in conjunction with other security-related records. We have not included provisions for third-party certification in the Facility Security interim rule, found in today's **Federal Register** however we have included provisions for Alternative Security Programs that could streamline the certification process.

#### *Other Security Provisions*

33. *Permanent Hull Marking Requirement.* In our notice of meeting, we discussed the SOLAS amendments creating a new regulation in Chapter XI-1 (Regulation 3) that requires vessels to have their identification number permanently marked on their hull and in an easily accessible place on the transverse bulkhead of the machinery space or on another suitable interior location, as specified. We discussed our intention not to extend the application of this requirement to vessels limited to domestic voyages and requested comments on this SOLAS provision and its application to the domestic trade.

An extremely large number of comments were received on this issue. Almost every comment strongly supported our concept to not require the hull markings for vessels that only engage in domestic voyages, including all international voyages not subject to SOLAS. Several commenters asked for exemptions for certain vessel types such as historically significant vessels. We believe that the requirement should not be extended to domestic vessels and, in the Vessel Security requirements found elsewhere in today's **Federal Register**, we have only applied the requirement to those vessels obligated to meet the SOLAS requirement. In accordance with SOLAS, a passenger vessel of 100 gross tonnage, ITC and upwards, and cargo vessels of 300 gross tonnage, ITC and upwards, on an international SOLAS voyage should be marked in accordance with its guidance.

34. *Continuous Synopsis Record Requirement.* In our notice of meeting, we discussed the SOLAS amendments that created a new regulation in Chapter

XI-1 (regulation 5) that requires vessels to maintain and update a Continuous Synopsis Record, to be kept on board, that contains information such as the name of the flag administration, the date of the vessel's registry, the vessel's identification number, etc. We discussed our intention not to extend the application of this requirement to vessels limited to domestic voyages and requested comments on this SOLAS provision and its application to the domestic trade.

An extremely large number of comments were received on this issue. Almost every comment strongly supported the Coast Guard position of not requiring the Continuous Synopsis Record for vessels that only engage in domestic voyages. Many of the comments stated that the information was already on board the vessel and readily available. A few comments were in favor of requiring the information for domestic vessels stating that if the information were in one place it would be useful. While we believe that having the information in one document would be helpful in certain instances, we feel that the value added by requiring another document to be carried on a domestic vessel is not sufficient to do so. The information on the Continuous Synopsis Record is currently maintained on the Certificate of Inspection and the Certificate of Documentation, both of which are required to be on a vessel when it is operating. Therefore, we believe that the requirement should not be extended to domestic vessels and, in the Vessel Security requirements found elsewhere in today's **Federal Register**, we have only applied the requirement to those vessels obligated to meet the SOLAS requirement.

35. *Security Alert System Requirement.* In our notice of meeting, we discussed the SOLAS amendments that created a new regulation in Chapter XI-2 (regulation 6) that requires vessels to have a security alert system. The Coast Guard is considering applying the requirement to vessels limited to domestic voyages that are engaged in the transport of certain dangerous cargoes. We discussed our intention to extend the application of this requirement to vessels on international voyages and also requested comment on whether this type of system could be useful on certain domestic voyages such as those involving the transportation of certain dangerous cargoes or large passenger vessels.

Many commenters supported extending the requirement to other cargoes and noted the need for alerting us if there were any problems in a quick