

contractors (about 2/3 of all OCS operators participated in 1998). From these data, we are able to calculate rates for the data submitted. Receiving information on hours worked from all OCS operators would allow MMS to produce normalized injury/illness analyses and trend data for all injury incidents reported to MMS.

2. What kind of information should MMS collect about contractor performance on the OCS?

According to 1998 OCS Performance Measures data, contractors represented about 80 percent of the total hours worked on the OCS and were involved in over 80 percent of the recordable and lost workday injury and illness cases. Gathering and analyzing data specific to contractors and contract operations

might provide insight to operators, contractors, and MMS about ways to decrease injuries to contractors and enhance the safety of contract operations.

3. What specific incident data analyses could MMS publish to help lessees/operators enhance the safety of their operations?

MMS intends to provide OCS lessees, operators, and others with the most useful incident data analyses possible. Are there specific analyses that would be particularly helpful to the industry or other regulators in preventing incidents and promoting safety?

4. What kind of electronic reporting methods are most accessible to you as an OCS lessee/operator? What

recommendations do you have for developing an electronic system?

#### Response to Comments On the February 13, 1998, Proposed Rule

The table below lists the several comments (by organization) we received about incident reporting requirements in response to the February 13, 1998, proposed rule on "Postlease Operations Safety." The "MMS Response" column provides our response with respect to this proposed rule. Letters from Chevron, Independent Petroleum Association of America, National Ocean Industries Association, and Shell Offshore Inc., indicated that they supported the comments submitted jointly by the API/Offshore Operators Committee.

Previous proposed rule section	Comment	Rationale	MMS response
<b>Trustees for Alaska</b>			
§ 250.20(a) .....	We support the requirement for written accident reports		A requirement for written reports is included (§ 250.188–190).
§ 250.20 .....	We encourage the MMS to revise the accident reporting requirements that are being discussed by the USCG National Offshore Safety Advisory Committee Subcommittee which includes MMS members.	Offshore operators should not be required to report incidents using two different forms to two separate Federal Agencies. In addition, the definition of fire is still an issue of confusion between operations, and an explanation may be appropriate in the regulations.	MMS and the USCG participated in the NOSAC Subcommittee and subsequently worked together to develop this MMS proposed rule. The reporting requirements in this MMS proposed regulation are as consistent as possible with the requirements in the USCG's proposed rule, so that the USCG will be able to allow reporting under the MMS regulation for incidents where both agencies have mutual interest and responsibility. The requirement to submit written reports electronically would allow reports submitted through a single point to satisfy the requirements of both agencies.  While proposing the use of an MMS form in conjunction with form CG–2692, most of the information on the MMS form is not duplicative of information requested on form CG–2692. MMS and the USCG agree that a joint incident form would be beneficial to both the industry and our agencies. We will continue to work on developing one.  A definition and reporting thresholds for fires are included (§ 250.105 and § 250.187–190).