

Revise the TWIC Proposal to Support the Administration's Homeland Security and Economic Vitality Goals

- On May 22, the Transportation Security Administration and the Coast Guard issued proposed regulations to implement the requirement of the Maritime Transportation Security Act (MTSA) of 2002 for a Transportation Worker Identification Credential (TWIC). The TWIC, a biometric identification card, is meant to be used in conjunction with vessel and facility security plans to ensure that individuals who could pose security risks do not have access to vital maritime transportation assets.

- **In its current form, the TWIC proposal is at odds with the Administration's goal of instituting robust, risk-based security measures that reduce real vulnerabilities without impeding the efficient flow of the nation's commerce.** It will:
 - Impose more than \$50 million in direct costs on the tugboat, towboat, and barge industry alone, for dubious security benefit. Crewmembers on a six-person towing vessel would be required to scan biometric identification cards in order to board a vessel they have worked on for years with other crewmembers they have known for years!
 - Exacerbate a severe shortage of vessel personnel, which could force the tie-up of hundreds of towing vessels critical to the movement of the nation's commerce. New entrants to the industry will be driven away by the requirement to make two trips to a TWIC "enrollment center" that could be located in another state, pay a \$150 user fee, and wait up to 60 days before being allowed to work in the industry and earn a paycheck.
 - Saddle U.S.-citizen crewmembers on U.S.-owned vessels with burdensome new requirements that do not apply to foreign-flag vessels operating in the same ports and waterways.

- Unlike other Administration-promulgated security regulations for the maritime industry, the TWIC proposal makes no distinctions based on operational risk or scale. Requirements developed with high-traffic, security-sensitive operations in mind (such as public ports) have been extended to small vessels and facilities with a very different risk profile. **This complex, expensive, one-size-fits-all approach is not necessary to ensure high levels of maritime security or to meet the TWIC mandate of MTSA 2002.**

- To improve homeland security while keeping the nation's domestic maritime commerce flowing, the TWIC proposal should be revised to:
 - **Eliminate the TWIC reader requirement** for towing vessels;
 - **Streamline TWIC processing** through a system such as the National Instant Criminal Background Check System currently used for firearms purchases; and,
 - **Establish an interim work provision** that allows crewmembers to work on an interim basis pending the formal issuance of a TWIC.