



“Challenges of Complying with Requirements”

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Who are the players?

- Agencies: Federal / State
 - Planners v. Responders
 - Where is the “UC?”
- Operators: Plan holders
 - Domestic
 - Overseas
 - Regular / Spot Passage
- Service Providers [acronym soup]
 - OSRO’s, PRAC’s, NTVCC, RPF’s, IMT’s, etc

Similarities in Regulatory Environment

- Planning standards not performance standards
- All require “relationship” with shore side capabilities
- Each think their regulations / requirements most important

Differences in Regulatory Environment

- Fed model
 - Planning Standard, Alt. Planning Criteria
 - Contract req'd, "other approved means"
 - Complete "VRP"
- State model
 - Flexibility for planholder
 - Prescriptive / flexible for NTV
 - RPF, IMT, NTVCC
 - NTV's have plan submittal options

Compliance Challenges – who pays for what?

- Transit vessels only [Fed NTV]
 - Need equipment, contracts: ~ 3,999+ vessels
- Calling to AK ports
 - Fed compliance – approved VRP
 - State compliance – flexible with NTV
- Collecting fees and sharing costs
 - Planholders vary by type and activity
 - Fee structure and administration over time

Issues to Keep in Mind for Compliance in Aleutians

- No focal point for administrative issues w/ most “Transit” ship operators
- Remote area requires cascading of resources
- Alignment of Fed / State Requirements makes sense ...
 - One compliance regime for area makes compliance more likely
 - Higher probability system cost sustainable over time