

June 28, 2000

Mr. Peter Morris
Chairman
International Commission on Shipping
PO Box 162
Civic Square Canberra
Act, Australia 2614

Dear Mr. Morris:

We read with great interest your letter and paper on international ship safety and support the efforts of the Commission to eliminate sub standard ships from our waterways.

The Port of New York/New Jersey is the largest port complex on the East Coast of North America and is the gateway to the most concentrated consumer market in the world. Each year more than 16 million tons of oceanborne general cargo moves through our port, including nearly 2.5 million TEUs (twenty-foot equivalent units) of containerized cargo.

The Port Authority of New York & New Jersey is a bi-state agency formed in 1921 to promote trade and commerce in the entire port region and to manage the operation of seven cargo terminals in the New York-New Jersey region. Our role is primarily that of a landlord so the Port Authority does not get involved in the daily operation of vessels or marine terminals. However, the safety and environmental protection of our harbor is critical to our success as an international gateway.

Screening out sub standard ships in the United States is primarily the responsibility of the United States Coast Guard through the Port State Control program. The Coast Guard has established a "Boarding Priority Matrix" to facilitate a risk assessment and determine which vessels should be boarded and inspected. These boardings are directed by the Coast Guard Captain of the Port (COTP), who is responsible for ensuring the safety of vessels and the protection of the navigable waters throughout his or her geographic zone. Additional information on the methodology can be found on the Coast Guards Port State Control website at: <http://www.uscg.mil/hq/g-m/psc/psc.htm>

The industry does not necessarily need more rules and regulations to improve marine safety. Uniform and global policies, which guarantee the enforcement of the existing regulations along with proper enforcement should make it impossible for sub standard operators to continue doing business. In the end, sub standard ships can only truly be combated through active partnerships among vessel owners, operators, charterers, mariners, underwriters, flag states and class societies.

We would be happy to meet with you and help coordinate a meeting with the Coast Guard and our port stakeholders during your proposed visit in September. Please contact my staff if you have any questions or if we can be of further assistance.

Sincerely,

Lillian C. Borrone
Director
Port Commerce Department