



November 14, 2011

Submitted Electronically

RE: Oil and Gas and Sulphur Operations in the Outer Continental Shelf – Revisions to Safety and Environmental Management Systems (SEMS II) (BOEM-2011-0003)

Dear Sir or Madam:

The Offshore Marine Service Association is the national trade association representing the owners and operators of U.S.-Flag vessels that support the offshore energy sector. OMSA's members include more than 100 vessel operating companies, representing roughly 1,200 vessels that carry the equipment, supplies and workers in support of the exploration and development of offshore oil and gas resources in the Gulf of Mexico.

The U.S. offshore vessel industry requests that BOEMRE recognize that it is pervasively regulated by the U.S. Coast Guard. U.S. vessels that support the offshore oil and gas industry follow the most stringent safety, security and pollution requirements and our mariners are the most highly credentialed and trained in the world. The majority of offshore U.S. offshore vessels are ISM (International Safety Management) certified. ISM and SEMS strive for the similar goal of a safe working environment. However, the terminology and specific elements are different. ISM has been designed to meet the specific and unique operational requirements of the maritime industry. In many cases, SEMS terminology, developed for facilities often use incorrect terminology and methods that are inconsistent with safe operating requirements in the maritime industry. Therefore, we strongly suggest that the SEMS II regulation explicitly state that U.S. flag vessels covered by an ISM program are considered to be substantially equivalent to the SEMS requirement without any further documentation.

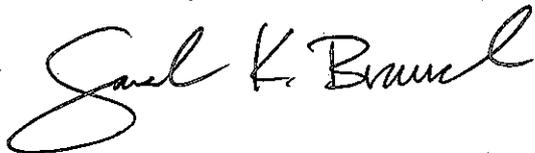
Safety, pollution prevention, and regulatory efficiency are dependent on operator developed and directed safety and environmental management programs. The industry as a whole has a long history of actively managing its operations to achieve safety and environmental objectives. SEMS must be a part of a broader regulatory strategy: Safety management systems are intended to replace command and control regulations, not supplement them. The biggest deficiency in the BSEE regulatory program is the absence of a strategy for transitioning to a goal setting, safety management regime on offshore facilities.

Rather than increase safety risks and costs by further complicating the OCS regulatory regime, we recommend that the BSEE, BOEM, the Coast Guard, and PHMSA agree on a common regulatory

strategy for all OCS facilities. In our opinion, this strategy should provide for a transition to a goal-setting, safety management regime. It should also be effectively recognized that the Coast Guard maintains exclusive, direct regulatory jurisdiction over vessel operations.

Thank you for the opportunity to comment and relay our industry's concerns and recommendations.

Sincerely,

A handwritten signature in cursive script that reads "Sarah K. Branch". The signature is written in dark ink and is positioned above the typed name.

Sarah K. Branch
Director of Government Relations