



16732  
April 15, 2020

The Honorable Robert L. Sumwalt  
Chairman, National Transportation Safety Board  
490 L'Enfant Plaza, SW  
Washington, DC 20594

Dear Chairman Sumwalt:

The Coast Guard has reviewed the National Transportation Safety Board's November 13, 2019, letter providing information about the Board's safety recommendation report, *Improving Vessel Survivability and Passenger Emergency Egress of DUKW Amphibious Passenger Vessels*, which was developed in connection with the Board's investigation of the sinking of the STRETCH DUCK 07 on July 19, 2018. As a result of its efforts developing the safety recommendation report the Board issued safety recommendations M-19-15 and M-19-16 to the U.S. Coast Guard (USCG). The following is our response to those recommendations.

NTSB Recommendation M-19-15: Require DUKW amphibious passenger vessels (commonly referred to as original and/or "stretch" DUKWs) to have sufficient reserve buoyancy through passive means, so that they remain upright and afloat with a full complement of passengers and crewmembers in the event of damage or flooding.

Response: We partially concur with this recommendation. While we agree that providing reserve buoyancy through passive means would increase the safety of the amphibious passenger vessel fleet, we are concerned that there may not be a feasible solution to achieve the stated goal. Modeling analysis conducted on DUKWs by the USCG has indicated that there is not sufficient below deck volume to provide reserve buoyancy using foam or watertight subdivision to enable the vessels to remain afloat and upright in the damaged condition. This would create a requirement that is not technically and/or practically achievable. As such, we are not convinced at this time that pursuing such a requirement is the appropriate course of action.

In the meantime, we continue to enforce the current regulatory requirements and rely on guidance found in Navigation and Vessel Inspection Circular No. 1-01 *Inspection of Amphibious Passenger Carrying Vehicles*, to assess the safety of amphibious passenger vessels and their operation. We have supplemented those requirements and guidance by issuing additional safety guidance on August 1, 2018, recommending marine inspectors immediately review amphibious vessel routes and operational manuals, conduct crew training, and encourage companies to support personnel with communicating urgent issues such as weather conditions to vessel masters.

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Any future consideration will be guided by the findings and recommendations provided from the investigations by the Board and USCG's Marine Board of Investigation into the sinking of the STRETCH DUCK 07 once they are completed. We feel the above actions combined with the actions we are taking to address canopies on DUKWs satisfies the intent of this recommendation and we recommend that it be closed.

NTSB Recommendation M-19-16: For DUKW amphibious passenger vessels without sufficient reserve buoyancy (commonly referred to as original and/or "stretch" DUKWs), require the removal of canopies, side curtains, and their associated framing during waterborne operations to improve emergency egress in the event of sinking.

Response: We concur with this recommendation. The removal of canopies, side curtains, and associated framing from the DUKW fleet would improve emergency egress. As such, we are taking actions to address canopies on DUKWs. We intend to issue a Marine Safety Information Bulletin (MSIB) which will recommend that DUKW owners remove canopies and side curtains to improve passenger egress. This MSIB will be the first step in the USCG's process to address canopies or identify other engineering solutions that would improve emergency egress. We will keep the Board informed of our progress on this recommendation.

Sincerely,

A black rectangular redaction box covering the signature of Daniel B. Abel.

DANIEL B. ABEL  
Vice Admiral, U.S. Coast Guard  
Deputy Commandant for Operations