

236814

1 of 2

Grand Lady Cruises Inc.
100 Whitehaven Rd.
Grand Island NY 14072
716-774-8594

DEPT. OF TRANSPORTATION
DOCKETS

2003 FEB 28 P 4:00

February 28, 2003
Ms. Dorothy Beard, Chief of Dockets
Docket Management Facility
(USCG-2002-14069) ← 293
U.S. Department of Transportation, Room PL-401
400 Seventh Street, SW
Washington, DC 20590-001

Subject: Maritime Security Notice

Ref: a) Federal Register, Vol. 67, No. 250, Mon. Dec. 30, 2002

Dear Ms. Beard

Grand Lady Cruises Incorporated is a small closely held family operated seasonal business, (carrying less than 10k person annually) formed in 1998 at Buffalo New York. We operate the M/V Grand Lady #992188 a 149 passenger vessel classified as T on the waters of Lake Erie and the upper Niagara River. We do not consider any of are cruises to be transportation as all cruises depart point A and return to point A. These cruises are social functions afloat with invited guests, serving a wide variety of clients. Our customer base includes church, school; fraternal, organizations service club, corporation, weddings and groups of people celebrating any carefree occasion.

Although the current rule making does not effect vessels of our type, I have been told it is under consideration to include T vessels. I believe that these current regulations are being painted with to wide of a brush, and if enforced will be devastating to K boat operations and catastrophic to T boats. It would be impossible for us to adsorb or pass on the added costs of operation to implement these regulations, and would definitely put me and many more like me out of business.

In these times I agree with the need for added port security, but ask that you look at our industry (the hospitality industry) and understand we service all types of people and groups. It is not possible to lump all vessel operations into one barrel and write a one size fits all regulation.

I encourage the USCG and the Transportation Security Agency to work closely with The Passenger Vessel Association to collectively work to improve security. The PVA Security Guidelines that are under development will provide an excellent framework for companies like mine to develop are own security plans. My company will certainly use those guidelines in developing a security plan.

Sincerely,

Richard A. Deegan
President and Captain
Grand Lady Cruises Inc.