

HAWAII PORTS MARITIME COUNCIL

affiliated with

Maritime Trades Department

AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

606 Kalihii Street Honolulu, Hawaii 96819

TELEPHONE: (808) 845-5222

FAX: (808) 841-1191

Member Unions

*International Brotherhood of
Boilermakers Iron Ship
Builders, Blacksmiths
Forgers and Helpers
Lodge 627*

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*International Union of
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*Inlandboatmen's Union
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*Masters Mates and Pilots,
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Sailors Union of the Pacific

Seafarers International Union

*United Food and Commercial
Workers International Union
Local 180*

Docket Clerk

Office of International Trade
U.S. Customs and Border Protection
1300 Pennsylvania Ave. NW
Washington, D.C. 20229

December 19, 2007

RE: Docket IS USCBP-2007-0098-Hawaii Coastwise Cruises

Thank you for this opportunity to write in support of the U.S. Customs and Border Protection's proposed Interim Rule regarding Hawaii Coastwise Cruises. This Council, representing workers involved in or directly related to Hawaii's maritime industry, is very pleased to see that Customs and Border Protection is taking appropriate steps to protect American jobs on U.S.-flag cruise ships that operate in Hawaii. More than 7,000 Hawaii jobs are at stake in this matter.

Foreign-flag cruise ship operators have designed itineraries expressly for the purpose of circumventing the intention of the Passenger Vessel Services Act. These operators profit from the fact that they do not pay U.S. taxes, that they pay their ships' crews well-below even U.S. minimum wages, and are not responsible for a myriad of U.S. laws. Because of that, these foreign ship operators profit at the expense of those who do comply with U.S. law.

The Proposed Rule helps to establish a more level playing field, and goes a long-way to close the blatant circumvention of U.S. law by foreign interests.

This Council strongly commends the CBP for issuing the proposed interpretive rule because it is consistent with U.S. cabotage laws.

We urge the immediate adoption of the rule.

Sincerely,



Neil Dietz,
Secretary-Treasurer

