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OCT 31 2008

Mr. Joe Keefe  
The Maritime Executive  
3200 S. Andrews Ave., Suite 100  
Fort Lauderdale, FL 33316

Dear Mr. Keefe:

Thank you for your continued thought-provoking and interesting editorials.

In response to your recent editorial "Wakeup Call: The Road to STCW Compliance Starts To Get Bumpy . . ." [Sept. 25, 2008, Vol. 6, No. 39] that addresses, in part, the new medical Navigation and Vessel Inspection Circular 04-08, I offer some additional perspectives.

NVIC 04-08 was developed in concert with the Merchant Marine Personal Advisory Committee and the Towing Safety Advisory Committee to replace the outdated NVIC 02-98. The process was deliberative and spanned a period of more than two years not because the process was inefficient, but because the Coast Guard placed a premium on listening and gathering input from stakeholders to develop the best possible guidelines for physical and medical standards.

Your editorial addressed the complexity of the new NVIC, which does contain quite a bit of medical terminology. This NVIC is intended for use by the doctors, nurses and physician assistants who conduct medical exams and the terminology used in the NVIC should be familiar to these medical professionals. One of the key reasons for creating NVIC 04-08 was to increase transparency with medical professionals and mariners so that they know what is expected and to reduce the amount of time for the application to be processed the first time.

You also expressed concern that the new NVIC would ultimately reduce the number of medically qualified mariners, but our data has shown that this is not the case. The denial rate has not increased since the standards in this NVIC were put in place. The information below should be of interest to you and your readers:

- Eighty-seven percent of all applications require no medical evaluation.
- The Medical Evaluations Branch cycle time has been reduced by 19.3 percent.
- The overall denial rate is 0.11 percent. That is about 1 out of 1,000 mariners.

The primary reasons for an application being denied have not changed with this NVIC. Denials are a result of a condition that had the potential to cause sudden incapacitation or loss of cognitive physical performance. The five most common reasons the National Maritime Center has denied applications are for serious medical conditions as follows:

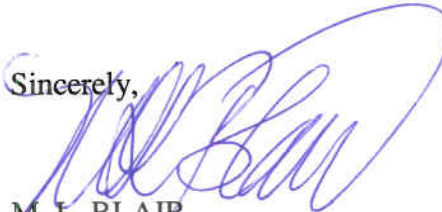
- Implantable cardiac defibrillators
- Chronic use of narcotics, amphetamines, benzodiazepines

- Uncontrolled diabetes
- Psychotic and uncontrolled bipolar disorders
- Uncontrolled sleep disorders

I would like to extend a personal invitation to you to visit the National Maritime Center to obtain a closer look at the process.

U.S. merchant mariners are key to the maritime safety and security and the economic prosperity of not only our nation, but of the world. The U.S. merchant mariner workforce is aging and we believe that a robust and vibrant cadre of American merchant mariners is vital and that these notions are not mutually exclusive. I am encouraged that many companies and unions are using NVIC 04-08 as a basis for their programs addressing the overall wellness of the mariners that they employ. We applaud those initiatives as positive measures to achieve the cadre of American merchant mariners that our nation deserves.

Sincerely,



M. L. BLAIR  
Captain, U. S. Coast Guard  
Chief, Office of Operating and  
Environmental Standards