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27 August 2004

Document Management Facility [USCG-1998-3798]
U.S. Department of Transportation
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Docket USCG-1998-3798

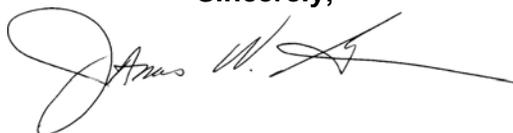
I offer the following comments in response to the USCG's reopening of the comment period as noted in 69 FR 49844 dated 12Aug04.

Noble Corporation and its subsidiaries own and operate 59 Mobile Offshore Drilling Units world-wide. Two of these MODUs are undocumented barges. These vessels have been subject to USCG inspection since the implementation of 46 CFR Subchapter I-A. The USCG has issued a CG number to each vessel to identify it in its computer system, with this number appearing on the vessel's Certificate of Inspection. The Coast Guard also identifies these vessels by their IMO numbers for the purposes of the Certificates of Financial Responsibility and some correspondence relating to Inspection User Fees. I have no objection to the use of either number to identify these MODUs.

Specific comments on the proposed rules in 66 FR 2385 dated 11Jan01 follow.

- § 66.15 "Barge number" – Supposedly the NVDC will issue the number. The USCG should continue the CG numbers issued to undocumented vessels subject to USCG inspection.
- § 66.20 The form of the Bill of Sale is not part of the docket. Will the USCG accept any format, or will the format in the Bill of Sale Form CG-1340 be specified?
- § 66.35 I have no problems with marking the CG Number on the interior structure of the vessel; however, the rule should state that the number be marked on a main beam or bulkhead such that the number is clearly visible. As to marking the number on the exterior, this exceeds what is required for documented barges. Noble's undocumented MODUs have their name and hailing port marked on them as specified by 46 CFR 67.123.

Sincerely,



James W. Gormanson

cc: Dave Beard