



# BUNGE CORPORATION

*Marine Department*

P. O. Box 28500

11720 Borman Drive

St. Louis, MO 63146

314-872-3030

96171

October 27, 1998

Docket Management Facility

USCB 98-3798-3

U. S. Department of Transportation  
Room PL-401  
400 Seventh Street SW  
Washington, DC 20590-0001

DEPARTMENT OF TRANSPORTATION  
98 OCT 30 PM 1:07  
COMMUNICATIONS SECTION

Re: Advance Notice of Proposed Rulemaking, 63 FR 36384  
Numbering of Undocumented Barges

Dear Sirs:

Bunge Corporation is a barge owner.

The following are our brief comments concerning the proposed rulemaking:

It is stated in the Notice that the cost for a mandatory numbering system is estimated to be from \$7.0 to \$21 .0 million. The coast Guard estimate of cleanup costs for abandoned vessels between January 1988 and September 1991 was \$4.4 million, 15% of which was attributable to abandoned barges, or less than \$700,000. Thus, the cost/benefit of a numbering system would appear to weigh heavily against such a system, even if it were successful in reducing the cost of abandoned barge removal. In fact, there are no assurances the system would do anything towards identifying ownership of abandoned barges (all one would have to do is remove the identifying numbers), let alone assure that the barge owner would have the financial ability to pay for removal even if identified. We therefore believe a numbering system, especially a costly one, would be burdensome, disproportionately expensive, of questionable benefit, and should not be required.

That being said, if there must be a system, we believe that numbering should be similar to the existing system for documented barges, that the marking requirements should be identical, and that the same number should remain assigned to the barge throughout its life regardless of ownership. We favor simplified and relaxed requirements regarding proof of ownership and recommend that electronic application and updating be utilized. While from a

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practical viewpoint the cost of marking the vessel would have to be borne by the barge owner, we feel the government should charge no fee.

Sincerely,

BUNGE CORPORATION

A handwritten signature in black ink, appearing to read "Rick Sadtler". The signature is fluid and cursive, with a large initial "R" and "S".

R. Sadtler  
Marine Operations Manager

RS/cvd  
RS110013