

Congress of the United States
House of Representatives
Washington, DC 20515-1801



July 14, 1999

Rules Processing Team
Department of the Interior, Minerals Management Services
Mail Stop 4024
381 Elden Street
Herndon Virginia 20170-4817

RE: Proposed Changes To 30 CFR Subpart O Training Regulations

Ladies and Gentlemen:

It has been brought to my attention that the MMS is proposing changes to the above referenced federally administered program. I am concerned that the defined periodic training and the accreditation process that training entities now undergo will be lost, and that such a loss will ultimately affect the quality of personnel that operates in the OCS.

As I review this issue, I question what research and studies have been performed to document the need for such changes. This is a significant change from the existing program and one that should be done only if the changes are clearly and definitely shown to be warranted.

My concerns about these changes are many. I highlight just one, however: What federally mandated assurances do we have that the lessees will in fact follow the recommended guidelines and that the industry will continue to have high turnover rate personnel up to speed and ready to meet the challenges of their job responsibilities? Leaving such responsibility up to the lessee to oversee the competency of every individual who may fall under his auspices is a tremendous burden. It is a burden that I fear can not be properly administered by lessees operating in the OCS without more definite and prescriptive regulations by the MMS. For the relatively small expenditure for the MMS to continue to administer the existing program versus the possible consequences of non-compliance, I do not believe these changes are warranted without significant further study.

Please accept this letter as my comments submitted under the relevant comment period as specified.

Sincerely,

David Vitter
Member of Congress