INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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RULES PROCESSING TEAM

JUL 14 2003

10 July 2003

Department of Interior
Attn: Rules Processing Team (Comments)
Minerals Management Service (MS-4024)
381 Elden Street
Herndon, VA 20170-4817

Re: Incident Reporting Requirements (RIN 1010-AC57)
Request for Extension of Comment Period

To Whom It May Concern:

The International Association of Drilling Contractors is a trade association representing the interests of the owners and operators of oil, gas, and geothermal well drilling equipment worldwide. Our membership includes all companies currently operating mobile offshore drilling units (MODUs) on the U.S. Outer Continental Shelf.

We believe that the issues raised by the Minerals Management Service's 8 July 2003, Notice of Proposed Rulemaking deserve serious consideration and have already scheduled a meeting with our membership to begin the process of drafting comments in response to the proposal. However, we do not believe that the present 6 October 2003 deadline for submission of comments provides a reasonable time for developing our response and coordinating it with our sister trade associations, particularly in view of the time that must also be devoted to the recent Maritime Security rules issued by the U.S. Coast Guard. Accordingly, we respectfully request that the comment period be extended by 120 days.

If you have any questions regarding this matter, please feel free to contact me by phone at (281) 578-7171, ext. 207 or, after 20 July 2003 at (713) 292 1945).

Sincerely,

Alan Spackman
Director, Offshore Technical
and Regulatory Affairs

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