

Daisy Roche

We are providing these brief comments on behalf of the International Group of P&I Club's Vessel Response Plan Working Group.

Section WAC 173-187-040 (22) defines a "P&I Club" as an "international protection and indemnity mutual organization". We understand that in accordance with the guidance set out in the authorizing statute, RCW 88.40, this is not intended to limit P&I Clubs to the those within the International Group of P&I Clubs.

We also note that section WAC 173-187-200 (3) is intended to address requirements for an owner or operator that has more than one vessel or facility subject to financial responsibility requirements. In order to make it clear that this is intended to apply to multiple vessels or facilities that are required to obtain a COFR, we respectfully suggest amending the beginning of the section to read "(3) An owner or operator of more than one vessel or facility that is required to obtain a Washington COFR under this chapter may obtain...".