



December 4, 2007

Mike Waugh
Manager, Program Assistance Section
Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Comments of the Cruise Lines International Association regarding the Proposed At-Berth Ocean-Going Vessels Regulation.

The Cruise Lines International Association (CLIA) members appreciate the opportunity to submit comments on the proposed shore power regulation. CLIA members have the following general comments on the proposed regulation.

General Comments

- The regulation does not include a provision to delay implementation if shore power is unavailable. As written, the industry would have to use shore power beginning in 2014, even if it is unavailable at a port of call. We respectfully request a delay in implementation be made for each port that is not equipped to provide shore power in the final regulation.
- It is unclear who is responsible for supplying the dock infrastructure. The terminal operator is required to complete a plan, but the proposed regulation does not identify who will be financially, or physically responsible for installation and maintenance of the shore power infrastructure.
- Transformers, and any frequency converters, must be ashore as these are large pieces of equipment that could not reasonably be placed onboard a passenger ship. The need for on-dock shore power equipment for passenger ships should be specifically recognized in the regulations.

Thank you again for the opportunity to provide these comments. CLIA members look forward to continue working with the Air Resources Board on practical emission control strategies. Please feel free to contact us if you have any questions on the comments provided.

Sincerely,

Terry Dale
President and Chief Executive Officer
Cruise Lines International Association