

National Transportation Safety Board

M/V Lady D Capsizing
DCA-04-MM-015

U. S. Coast Guard Comments to
Safety Board Factual Reports

September 29, 2005

Roth-Roffy Thomas

From: Trevor.C.Cowan@uscg.mil on behalf of Cowan, Trevor LTJG [Trevor.C.Cowan@uscg.mil]
Sent: Thursday, September 29, 2005 2:02 PM
To: Roth-Roffy Thomas
Cc: Dufresne, Joseph LCDR; Boone, George LCDR; Williamson, Connie Lieutenant(LT)
Subject: RE: Lady D - technical review of draft factual reports

Tom,

The only comments we have concerning the factual reports are the following:

"In the Engineering Factual, no discussion is made of the stability standards in Subchapter S. The factual implies that failure of the simplified stability proof test indicates inadequate stability for the intended route. This is incorrect. Failure of the proof test in 46 CFR 178.340 does not necessarily mean that the vessel lacks stability for the intended route, service, and operating condition, but that calculations or other methods must be used to evaluate the stability of the vessel (see 178.320(e)). Typically, unless the operator chooses to reduce passenger capacity until the vessel passes the proof test, the stability standards in Subchapter S (170.170, 170.173, 171.050) are used to determine whether the vessel's stability is adequate. The Marine Safety Center's report we provided to you provides further information on this as it relates to the LADY D."

Sincerely,
--Trevor

LTJG Trevor Cowan

U.S. Coast Guard Sector Baltimore

Investigations Division

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From: rothrot@NTSB.GOV [mailto:rothrot@NTSB.GOV]
Sent: Tuesday, September 27, 2005 1:42 PM
To: Jeff Harper (E-mail); Dufresne, Joseph LCDR; Beth.McNulty@noaa.gov; Robert Hopkins (E-mail)
Cc: Rabe, Doug; Kevin Johnston (E-mail); Scheffer James
Subject: Lady D - technical review of draft factual reports

Sirs,

On August 24, 2005, I mailed out copies of the draft factual reports from the *Lady D* accident investigation. The cover letter accompanying the factual reports requested your comments by Sep 16, 2005. Living Classrooms Foundation requested, and was granted, an extension for delivery of their comments until the end of September. To date we have received comments only from the National Weather Service. We hope that you will not miss this opportunity to provide input into the investigation.

If possible, please provide your written comments on the factual reports by the end of next week, Oct 7, 2005, or sooner. If you have no comment to make, please just send me an email so stating.

10/21/2005

Thank you,

Tom Roth-Roffy, IIC