Mr. Stewart Wade, Vice President, American Bureau of Shipping

**Question:** Are there specific recommendations that the Commission should make regarding the present ship classification structure, and specifically about compliance?

**Response:** The current structure of ship classification has evolved over many decades. It has served the industry, the public and the environment effectively throughout that period as evidenced by the steady and continuing decline in marine casualties and marine pollution incidents both in U.S. waters and worldwide. Infrequent, high profile marine casualties have tended to focus the attention of governments on the classification sector. At the present time, such a reassessment is being undertaken at the International Maritime Organization (IMO) (to which the U.S. Government is party) and at the European Commission. The IMO focus is on the manner in which the technical standards are established by the classification societies. The European Commission is concerned with the corporate governance of the societies. It is possible that, following extensive intra-industry and industry-government discussions some refinements to the classification structure may be proposed. At the present time the American Bureau of Shipping (ABS) is participating individually, and through the International Association of Classification Societies and as an adviser to the U.S. government delegation to the IMO on these issues. As such, ABS makes no request or recommendation to the Commission with respect to this topic at this time.