



Mid-Atlantic Fishery Management Council

800 North State Street, Suite 201, Dover, DE 19901
Phone: 302-674-2331 | FAX: 302-674-5399 | www.mafmc.org
Michael P. Luisi, Chairman | G. Warren Elliott, Vice Chairman
Christopher M. Moore, Ph.D., Executive Director

February 20, 2020

James Landon
Director, Office of Law Enforcement
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
1315 East West Highway, Suite 3301
Silver Spring, MD, 20910

Dear Mr. Landon:

On December 19, 2019, McMurdo notified NMFS and its customers that the McMurdo 'Omnitracs' VMS operated by vessels with Greater Atlantic Region permits would not be supported by its satellite provider after March 31, 2020. According to GARFO's notice to fishermen (distributed January 15, 2020) the 'Omnitracs' VMS unit will not function with any other satellite provider and must be replaced by April 1, 2020 or risk being out of compliance with VMS regulations in the region.

Several stakeholders in the Mid-Atlantic region have voiced their concern with this transition. Currently, fishermen are responsible for coordinating the purchase and installation of a new VMS unit. This is a costly burden that may not be able to be accomplished by the vessel owner/operators (new units vary in price but are approximately \$3,000) by April 1, 2020. In addition, according to the NMFS Office of Law Enforcement (OLE) update to the New England Fishery Management Council (January 28, 2020), the new McMurdo unit undergoing testing for approval lacks the inventory to support the 705 vessels that will require new hardware.

Due to the ongoing approval process, inventory issues, and installation services needed across a large geographic range, it may not be realistic to expect all affected vessels to have compliant VMS units by April 1, 2020. As a result, the Council urges OLE and NMFS to consider the stakeholder burden while industry responds to this loss of service and encourages NMFS OLE to work with industry and management partners to find creative solutions to achieve compliance. One possibility might be a second reimbursement for vessels impacted by the McMurdo decision.

Thank you for your consideration. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Moore". The signature is written in a cursive style with a large initial "C" and a horizontal line extending from the end.

Christopher M. Moore
Executive Director

cc: Michael Luisi, Warren Elliott, Karson Coutre