From: Kelley, Jeremy
To: Kelley, Jeremy;
Subject: Security Update TWIC ANPRM Summary
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Important Security Update

Advance Notice for TWIC Equipment Requirements Published

March 27, 2009, Washington, DC - The USCG published its' Advanced Notice of Proposed Rule Making (ANPRM) on the Transportation Worker Identification Credential (TWIC) electronic reader requirements. This long-awaited rule outlines the potential TWIC reader requirements for facilities and vessels and outer continental shelf facilities regulated by the Maritime Transportation Security Act (MTSA), and also calls for comments on requirements related to recordkeeping and amendments to security plans. The proposed rule separates facilities and vessels into three groups (A, B and C) based on a relative risk score and lays out the levels of scrutiny required of the TWIC, including minimum verification intervals and levels of scrutiny for personnel requiring unescorted access into restricted areas, for each group at various MARSEC levels. The Coast Guard will review comments, along with the results of the Pilot Program currently being conducted, and publish a Notice of Proposed Rulemaking, when additional comments will be called for. In the interim, comments in response to the ANPRM are due to the Coast Guard by May 26, 2009.

Key Components

A key component in the development of this proposed rule has been the National TWIC Pilot Program currently in various stages of operation at five (5) ports across the country, including the Port of Brownsville, where O'Brien's Response Management is the program manager. O'Brien's has worked with port officials to make Brownsville the only pilot participant with a fully operational access control system utilizing electronic TWIC readers to verify all security components of the TWIC. O'Brien's is currently working with the TSA in the Early Operational Assessment (EOA) phase of the pilot program to gauge the effects electronic TWIC readers, and associated proposed regulations, will have on port operations and regional commerce; as well as troubleshoot a number of issues relating to both the TWICs themselves, the electronic card readers and their real-life implementation . Through our role as manager of the pilot program for the Port of Brownsville, O'Brien's has played a key role in development of the National TWIC program.

View the proposed rule

Contact our Government Services Division for more information.
Call (281) 320-9796 or email government@obriensrm.com

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6620 Cypresswood Drive
Suite 200
Spring, Texas 77379
P. (281) 320-9796
F. (281) 320-9700
E. info@obriensrm.com

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