



International Association of  
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5 July 2017

Submitted via email: [ITP.Laws@noaa.gov](mailto:ITP.Laws@noaa.gov)

Jolie Harrison  
Chief, Permits and Conservation Division  
Office of Protected Resources,  
National Marine Fisheries Service  
1315 East-West highway  
Silver Spring, MD 20910

Re: Taking of Marine Mammals Incidental to Specified Activities; Geophysical Surveys in Atlantic Ocean (RIN 0648-XE283)

To whom it may concern:

The International Association of Drilling Contractors is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States.

The purpose of this letter is to provide our comments in response to the 6 June 2017 NOAA (82 FR 26244) request for comments regarding the issuance of the incidental take authorization of marine mammals incidental to conducting geophysical survey activity in the Atlantic Ocean in support of hydrocarbon exploration.

This request is submitted without prejudice to any differing views which might be expressed directly by IADC members.

IADC generally supports the issuance of the incidental harassment authorizations to incidentally take marine mammals during the specified activities in the U.S. waters of the Atlantic.

Should you have any questions about any portion of this correspondence, please contact me by phone at (713) 292-1945 Ext. 203.

Sincerely,

A handwritten signature in black ink that reads "John Pertgen".

John Pertgen  
Director, Offshore Technical and Regulatory Affairs