



EQUIPMENT OF THE VESSEL: RESTORING COMMON SENSE

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Executive Vice President and General Counsel

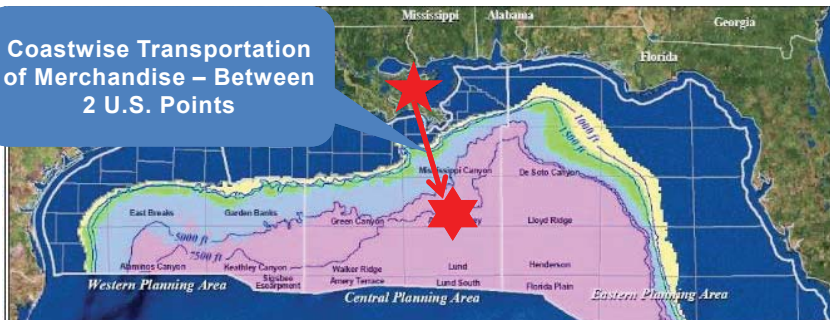
Houston
September 29, 2017

TRANSPORTATION OF MERCHANDISE BETWEEN TWO U.S. POINTS

Jones Act

A vessel may not provide any part of the transportation of **merchandise** by water ... between points in the United States ... unless the vessel...[is a qualified U.S.-flag vessel].... [T]he term “merchandise” includes ... valueless material.

Coastwise Transportation
of Merchandise – Between
2 U.S. Points



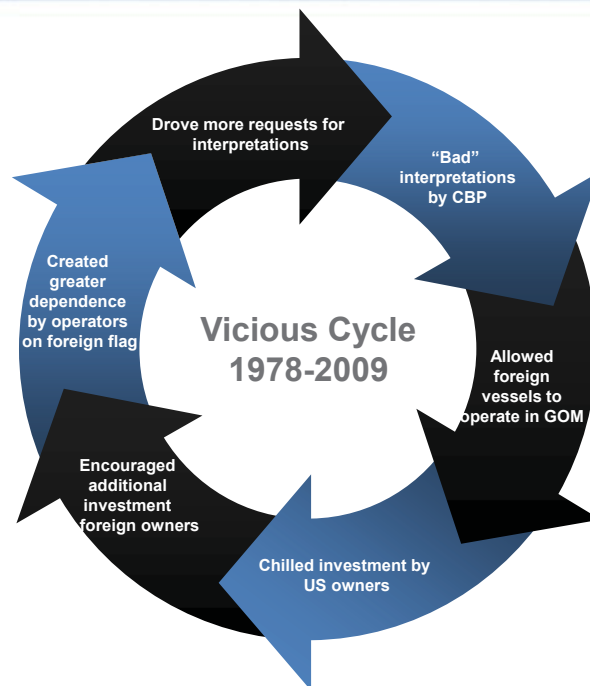
WITNESS A JONES ACT VIOLATION

VIDEO



3

OVER 160 FLAWED CBP LETTER RULINGS INVOLVING OCS OPERATIONS



4

2009 "CHRISTMAS TREE" NOTICE



5

CBP's 2009 Notice



Ancillary Transportation

"CBP recognizes that allowing foreign-flagged vessels to transport merchandise from one U.S. point and install that merchandise at another point on the OCS on the condition that it merely be accomplished 'on or from that vessel' would be contrary to the legislative intent of [the Jones Act]".

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