GENERAL COUNSEL OF THE
UNITED STATES DEPARTMENT OF COMMERCE
Washington, D.C. 20230

NOV 29 2007

The Honorable Daniel K. Inouye
Chairman, Committee on Commerce,
Science, and Transportation
United States Senate
Washington, D.C. 20510-6125

Dear Mr. Chairman:

This letter provides the views of the Department of Commerce on S. 950, the "Coastal and Ocean Observation System Act of 2007", as reported by the Commerce, Science, and Transportation Committee.

The Department supports enactment of an authorizing statute for the Integrated Ocean Observing System (IOOS). This legislation would provide for the establishment of an integrated national system of ocean, coastal, and Great Lakes observing systems. It seeks to build upon the existing infrastructure and maximize benefits of current investments. This approach is consistent with the goals of the Department and the U.S. Ocean Action Plan.

Each agency that participates in IOOS brings an important suite of capabilities and expertise to the development of a nationally integrated coastal and ocean observing system. The roles and responsibilities of each agency need to be clearly defined and outlined. For the purposes of implementation and operation, however, the Department recognizes the importance of a clear point of accountability for IOOS, and concurs that the National Oceanic and Atmospheric Administration should be designated as the lead federal agency for the administration and implementation of IOOS.

The Department opposes prescriptive language directing a specific percentage or amount of IOOS appropriations to regional associations. To ensure development of a coastal and ocean observing system that meets regional and national needs, NOAA should have unrestricted flexibility and discretion to distribute funding in a manner that most effectively implements IOOS.

The Department appreciates the opportunity to present these views on S. 950. If you have any questions, please contact me or Nat Wienecke, Assistant Secretary for Legislative and Intergovernmental Affairs, at 482-3663.

The Office of Management and Budget has advised that there is no objection to the transmittal of these views from the standpoint of the Administration's program.

Sincerely,

John J. Sullivan

cc: The Honorable Ted Stevens, Vice-Chairman
Senate Commerce Science, and Transportation Committee

The Honorable Maria Cantwell, Chair,
Subcommittee on Oceans, Atmosphere, Fisheries and Coast Guard

The Honorable Olympia J. Snowe, Ranking Member,
Subcommittee on Oceans, Atmosphere, Fisheries and Coast Guard