

Arcosa, Inc. and its subsidiary Arcosa Marine Products, Inc. ([Robert E. DeFrancesco, III](#); Counsel to Arcosa, Inc.)

On behalf of Arcosa, Inc. and its subsidiary Arcosa Marine Products, Inc. (“Arcosa”), we hereby submit the following comments to the Department of Transportation’s Maritime Administration (“MARAD”) in opposition to the Buy America waiver requests submitted by ECO Edison, LLC (“ECO”) and Offshore Wind Support, LLC (“OWS”). ECO and OWS each submitted requests to MARAD to waive the domestic content requirements for several foreign components used in the construction of service operation vessels. Among these foreign components include “watertight doors.” ECO’s/OWS’ sole justification for a Buy America waiver for watertight doors is the mere assertion that “[d]omestically manufactured components specified for the construction of a ship may be either unavailable or, if available, cannot be used as a substitute within a system of components that is foreign manufactured.” This justification is insufficient with respect to watertight doors, in particular, because these products are produced domestically, and in sufficient volumes and of a satisfactory quality. To this end, Arcosa regularly produces and sells products for marine vessels that fall within the scope of “watertight doors.” This includes Arcosa’s doors that are produced domestically. In fact, several of Arcosa’s watertight doors have received design approval from the American Bureau of Shipping program. Because watertight doors are available domestically, and consistent with this Administration’s policy goals of promoting “Made in America” and ensuring that U.S. taxpayer dollars are spent on domestically produced goods, ECO’s and OWS’ requests for a Buy America waiver should be denied. Aside from the fact that watertight doors are domestically available from Arcosa (and likely others), waiving the Buy America requirements for these products would negatively impact Arcosa’s continued production of watertight doors and discourage other domestic producers from investing in the manufacture of these products. Either result is contrary to the purpose of the Buy America program. Simply put, Buy America waivers should be granted infrequently and not, where, as here, products are domestically available. As such, ECO’s and OWS’ waiver requests should be denied.