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July 24, 2020

Linda D. George, Esq., Administrator
Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

Re: Interstate Navigation Company –
Request for Approval of continued operation of the M/V *Islander* from Point Judith –
Docket No. D-20-08

Dear Administrator George:

This office represents the Interstate Navigation Company d/b/a The Block Island Ferry (“Interstate”). As you know, Interstate operates passenger, vehicle, and freight ferries from Point Judith to Block Island.

As I explained in my letter to you dated June 19, 2020, due to the COVID-19 emergency, Interstate is being presented with a number of challenges to providing adequate service to the Island. For example, working with the Office of the Governor, the Department of Health, the Department of Transportation, and the Town of New Shoreham, we have reduced our passenger capacities to about 50% on all vessels to allow for sufficient deck space to conform with the state’s social distancing guidelines for ferries.

We believe it is imperative that, as the operator of the lifeline ferries to Block Island, we do everything we can do to meet the demands for our service. With regard to freight and vehicles, we have been able to implement a freight and vehicle schedule that meets the needs of the Island.

However, as we pointed out in our June 19, 2020 letter, with regard to passenger transportation needs, there were significant gaps in the early day fast ferry schedule departing Point Judith and in the late day fast ferry schedule departing Block Island. Most travelers to the island want to leave from Point Judith in the morning and return in the late afternoon/evening. Therefore, with your temporary approval, we added the fast ferry MV *Islander* to fill those schedule gaps in order to meet the passenger demand and to assist with social distancing at the reduced capacities.

With the capacity restrictions, the M/V *Athena* carries about 125 passengers and the M/V *Islander* carries about 185 passengers.

Since early July, the M/V *Islander* has been operating opposite of the fast ferry M/V *Athena* from Point Judith and we have had been able at peak travel times to meet the demand.

Despite the recent increase in fast ferry rates, passenger demand for the fast ferry is very strong. Both fast ferries have sold out to the maximum reduced capacities for almost all of the peak travel times throughout the month of July. This is helping to address the significant loss of revenue Interstate suffered in the spring due to the COVID-19 crisis.

As you know, 100% of profits generated by the fast ferry operation subsidize the traditional lifeline ferry rates.

In Order No. 23860 in Docket No. D-20-08, issued on July 2, 2020, the Division approved the use of the M/V *Islander* at Point Judith through Friday, July 31, 2020. The Division also said that if Interstate wished to keep the M/V *Islander* in Point Judith beyond July 31, 2020, Interstate must seek Division approval.

For the above reasons, and the reasons which are outlined in the joint Affidavit of Joshua Linda, Vice President, and William McCombe, Company Security Officer, Interstate is seeking permission from the Division to keep the M/V *Islander* in Point Judith for the remainder of the summer of 2020. Interstate has been informed by both the Town of New Shoreham and the City of Newport that they support this request.

We want to emphasize that this is a temporary, emergency situation which addresses the COVID-19 emergency capacity restrictions imposed by the state's ferry guidelines. Those guidelines also state that ferries may operate additional vessels on the routes in order to deal with the capacity restrictions (copy enclosed).

We fully expect to be able to return the M/V *Islander* to service in Newport for the summer of 2021, assuming the COVID-19 crisis has been resolved by then.

Thank you.

Very truly yours,


Michael R. McElroy

cc: Susan E. Linda
Town Clerk, Town of New Shoreham
Certified Mail RRR # 7019 1120 0001 6953 0926
Christy Hetherington, Esq.
John Bell
Katherine A. Merolla, Esq.

McElroy & Donaldson



THE CITY OF NEWPORT, RHODE ISLAND - AMERICA'S FIRST RESORT

State of Rhode Island
Division of Public Utilities & Carriers
89 Jefferson Blvd.
Warwick, RI 02888
Attention: Linda D. George, Esq.
Administrator

July 22, 2020

Dear Ms. George:

I am writing to you today in support of Interstate Navigation's request to continue to operate the M.V. Islander on the Point Judith ferry route instead of operating on the Newport to block Island summer ferry route.

If you have any questions or concerns regarding this letter, I can be reached by phone at 401-845-5815 or by email at tmills@cityofnewport.com.

Sincerely,

Timothy J. Mills
Newport Harbormaster

Harbor Division
City Hall, 43 Broadway, Newport, RI 02840
Telephone 401-845-5815--- Fax 401-849-8840
tmills@cityofnewport.com

STATE OF RHODE ISLAND
DIVISION OF PUBLIC UTILITIES AND CARRIERS

IN RE: INTERSTATE NAVIGATION COMPANY : DOCKET No. D-20-08

JOINT AFFIDAVIT OF JOSHUA LINDA AND WILLIAM McCOMBE

Joshua Linda, Vice President of Interstate Navigation Company (“Interstate”), and William McCombe, Company Security Officer of Interstate Navigation Company, both being duly sworn, depose and state oath as follows:

1. The Town of New Shoreham supports this request to continue to run the fast ferry *M/V Islander* from Point Judith for the rest of the summer of 2020.

2. Running the *Islander* from Point Judith has allowed Interstate to reduce the groups or “pods” of passengers that arrive at the dock. As a result, we are able to move the pods of people almost on an hourly basis. This results in less people waiting on the dock at any one time. This also allows us to have better social distancing by reducing the waiting passenger count while at the same time meeting overall passenger demand.

3. Running the *Islander* also allows overflow passengers on the traditional ferries to have a choice when the traditional ferries reach their reduced capacity maximums, which most often occurs with the last vessel leaving Block Island.

4. Using the *Islander* in Point Judith allows the vessel to assist in running a late unscheduled trip to accommodate capacity reductions on the traditional ferries. This trip usually travels to Block Island in the evening to assist in returning passengers to Point Judith. The *Islander* goes over to Block Island empty and then transports traditional passengers back to Point Judith in order to keep them from waiting on the dock in Block Island at night.

5. The Governor has established guidelines for ferries regarding reduced passenger capacity. We have followed these guidelines, which state that: “If needed, ferry operators will

be allowed to operate additional vessels to run the routes, based on ridership demand.” (copy attached).

6. Our bookings have shown that the demand for fast ferry travel from Point Judith is usually greater than the reduced space we have available, even with the *Islander* running.

7. In working with the Governor’s office, we have attempted to utilize contactless online ticket sales and we have regularly sold out to our reduced fast ferry capacity. If the *Islander* were not available, we would not even be able to come close to meeting fast ferry demand.

8. The M/V *Athena* is Coast Guard approved to carry 249 passengers. But due to COVID-19 capacity restrictions, in good weather, we typically sell 125 tickets. The M/V *Islander* is Coast Guard approved to carry 298 passengers. Due to COVID-19 capacity restrictions, in good weather, we typically sell 150 tickets.

9. When only the *Athena* is running, the passengers on the *Athena* only have the option of 2-hour departure intervals, with a normal passenger count of 249. When this was reduced to 125, those passengers were vying for one boat that was severely reduced in capacity. With the *Islander* in service at about half capacity, we can carry the usual number of passengers by using both vessels.

10. Many of the morning fast ferry travelers are those that commute back and forth for work and need the quick half hour trip. If we lose the capacity of the *Islander*, such passengers will be significantly inconvenienced.

11. With the *Islander* in service, we are able to manage crowds much more effectively with regard to “line management” because the groups or pods of passengers are spread out.

12. The *Islander* by design has attractive seating with respect to social distancing. She has an open top deck and outdoor seating on the sides of the vessel.

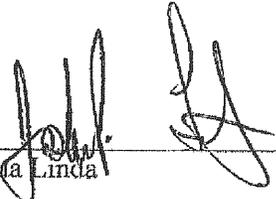
13. With the concerns of social distancing and minimizing exposure time to other passengers, the fast ferries reduce travel time on the boat to about 30 minutes instead of an hour (which may be one of the reasons why there is currently so much demand for the fast ferry).

14. Almost all of the travel from Newport to Block Island is elective, vacation travel. However, Point Judith is the hub for a combination of lifeline and elective travel. By running the *Islander* and maximizing our resources out of Point Judith while we are subject to capacity restrictions, we feel we are best serving the needs of the Island in these exceptional and challenging times.

15. We have worked hand in hand with the Town of New Shoreham, the Governor's office, the Department of Health, and the Department of Transportation from the onset of this COVID-19 epidemic, and we believe we are responding as best we can to the needs of the Town of New Shoreham by continuing to run the *Islander* for the summer of 2020.

16. We have been informed by the City of Newport that they are in support of the *Islander* not running out of Newport for the rest of the summer.

17. To date, we have received no complaints about the lack of service from Newport this summer.



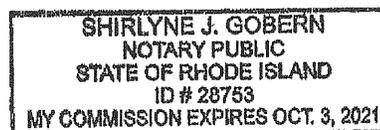
Joshua Linda

STATE OF RHODE ISLAND
COUNTY OF washington

Sworn to and subscribed before me by Joshua Linda, this 24 day of July, 2020.



Notary Public




William McCombe

STATE OF RHODE ISLAND
COUNTY OF Washington

Sworn to and subscribed before me by William McCombe, this 27 day of July, 2020.


Notary Public

SHIRLYNE J. GOBERN
NOTARY PUBLIC
STATE OF RHODE ISLAND
ID # 28763
MY COMMISSION EXPIRES OCT. 3, 2021

REOPENING RI

Phase II ferry operation and sightseeing operation guidelines

Beginning on June 1, 2020, ferry and sightseeing operations may continue essential lifeline services and continue seasonal service. In accordance with the Rhode Island Department of Health (RIDOH) emergency regulations, ferry and sightseeing operators must prepare and implement a [COVID-19 Control Plan](#). The RIDOH emergency regulations can be found [here](#). The State prepared a [guidance document](#) to assist businesses in meeting the requirements outlined in these RIDOH regulations. Ferry operators and sightseeing operators must comply with RIDOH regulations and active [executive orders](#).

The guidelines below summarize **additional** steps Rhode Island is asking ferry and sightseeing operators to take. If you have any questions about this guidance, please contact Joseph Masino at Joseph.Masino@governor.ri.gov.

Phase II Operations:

- **Physical distancing:** Passengers, whenever possible, must maintain six (6) feet of physical distance between themselves and others who are not part of their household, especially on the vessel when moving about, as corridors and walkways are narrow. Passengers are responsible for maintaining physical distancing at all times possible. Operators can assist with physical distancing on the vessel if they so choose, this includes but not limited to, boarding by party size and assigned seating. In addition, to allow for adequate distancing, ferry operators will limit cabin capacity and request passengers to remain with their vehicles, if safe to do so, or on deck during the duration of the trip (weather dependent). Operators should place spacing demarcations at ticket booths, concessions, and boarding lines.
- **Capacity:** In order to maintain physical distancing, capacity should be limited to 30% to 60% of the operating vessel's capacity (based on ridership demand, weather elements, and sea conditions). **If needed, ferry operations will be allowed to operate additional vessels to run the routes (based on ridership demand, weather elements, and sea conditions).** When weather and sea conditions limit outdoor seating, ferry operators should limit capacity to 30%-40%. When outdoor seating is not limited, operators should limit capacity to 50%-60%.
- **Screening Signage:** COVID-19 screening signage should be posted at the entrances and high traffic areas. For lifeline ferries, added safety protocols should be posted for boarding passengers needing transport for residence, medical or essential services.
- **Cleaning Procedures:** All cabins and commonly touched surfaces such as handrails, tabletops, and restrooms on the vessel must be sanitized between runs and at the end of the day. The entire vessel also must be thoroughly cleaned at least once a day.
- **Food & Beverage Sales:** All food and beverage sales shall follow the most recent Executive Orders, regulations, and/or guidance related to restaurants.



REOPENING RI

- **Bookings:** All ticket sales should be done online whenever possible to eliminate the need for paper tickets and to encourage cashless transactions. Service providers should inform customers of encouraging cashless transactions through social media and on company website.
- **Face Coverings:** All persons (employees and passengers) are required to wear face coverings in accordance with RIDOH regulations and [Executive Order 20-30](#). Face coverings shall not be required of those who are developmentally unable to comply, including young children who may not be able to effectively wear a mask. Nothing in this guidance shall require a place of business to refuse entry to a customer not wearing a face covering.
- **Customer Service:** Employees must wear face coverings while working in customer-facing roles. Employees are required to wash and sanitize their hands on a routine basis. Employees in positions that require direct contact with customers should wear gloves only if normally required to do so, along with their face coverings.

