



# MARINE MAMMAL COMMISSION

9 January 2020

Dr. Nature McGinn, ACA Permit Officer  
Permit Office, Room 755  
Division of Polar Programs  
National Science Foundation  
2415 Eisenhower Avenue  
Alexandria, Virginia 22314

Dear Dr. McGinn:

On 12 December 2019, the National Science Foundation (NSF) published a notice (84 Fed. Reg. 67969) requesting comments on a permit application from Red Rock Films. The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the permit request with regard to the goals, policies, and requirements of the Antarctic Conservation Act (ACA). Red Rock Films is requesting authorization to conduct filming activities<sup>1</sup> on killer and humpback whales in Antarctica during a three-month period. Individuals of any age class and either sex could be harassed. The filmmakers would implement various measures to minimize impacts on marine mammals and also would be required to abide by NSF's standard permit conditions. Dr. Ari Friedlaender serves as an off-site advisor to the filmmakers. The footage would be included in *Planet of the Whales*, an upcoming National Geographic documentary series.

The Commission believes that the proposed activities are consistent with the purposes and policies of the ACA and recommends that NSF issue the permit, as requested. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Peter O. Thomas".

Peter O. Thomas, Ph.D.,  
Executive Director

---

<sup>1</sup> Including filming from a vessel, underwater, on ice, and with unmanned aircraft systems.