

U.S. Department of
Homeland Security

United States
Coast Guard



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From: E. P. CHRISTENSEN, CAPT
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CG-543 Policy Letter
No. 11-12

To: Distribution

Subj: SEA SERVICE ON VESSELS MEASURED UNDER BOTH THE REGULATORY
MEASUREMENT SYSTEM AND CONVENTION MEASUREMENT SYSTEM

Ref: (a) National Maritime Center Policy Letter 15-02, *Sea Service on Vessels Measured
Under the International Tonnage Convention System (ITC)*
(b) 46 U.S.C.A. §7506
(c) 46 CFR Part 11
(d) Navigation and Vessel Inspection Circular (NVIC) 11-93, as amended, *Applicability
of Tonnage Measurement Systems to U.S. Flag Vessels*

1. PURPOSE. To provide guidance on acceptance of sea service from mariners serving on vessels that are measured under both the regulatory measurement system and the convention measurement system when applying for merchant mariner credentials.

2. BACKGROUND.

a. The convention measurement system is a U.S. tonnage measurement system that is based on and complies with the requirements of the International Convention on Tonnage Measurement of Ships, 1969 (ITC). Gross tonnages assigned under this system are referred to in terms of gross tonnage, ITC (GT ITC) or gross tonnage (GT). The regulatory measurement system is a U.S. tonnage measurement system that expresses gross tonnages assigned under that system as gross register tons (GRT).

b. The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) has tonnage thresholds expressed using GT per the requirements of the ITC while the Coast Guard's credentialing regulations are expressed in GRT under the regulatory measurement system. The ITC generally results in higher values than the regulatory measurement system, and in certain cases, a vessel's tonnage may be below a threshold when GRT is used, but above it when GT is used. There is no conversion factor between GRT and GT.

c. Previous policy provided that mariners would be credited with the tonnage that corresponds to the trade the vessel was engaged in at the time the service was acquired. For example, on a vessel that measures 375 GRT and 3,300 GT, the mariner would be credited with service on a vessel of 375 GRT on domestic voyages where the GRT is

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used, and would only be credited with the vessel's higher GT if the vessel were engaged on an international voyage where the GT applied.

3. DIRECTIVES AFFECTED. National Maritime Center Policy Letter 15-02 is superseded and cancelled by this policy letter.
4. DISCUSSION. The previous policy requires clarification to better assist mariners seeking to upgrade their credentials.
 - a. Mariners holding officer endorsements limited to not more than 1,600 GRT will have their officer endorsements note both the regulatory tonnage and the ITC tonnage. Mariners holding officer endorsements with tonnage restrictions calculated in accordance with 46 CFR 11.402 will have the restriction calculated using both the regulatory tonnage and ITC tonnage using the equivalents in subparagraph c. below. Title 46 CFR 11.402(b) provides the following:
 - i. The endorsement is limited to the maximum tonnage on which at least 25 percent of the required experience was obtained, or 150 percent of the maximum tonnage on which at least 50 percent of the service was obtained, whichever is higher. Limitations are in multiples of 1000 gross tons, using the next higher figure when an intermediate tonnage is calculated. When the calculated limitation equals or exceeds 10,000 gross tons, the applicant is issued an unlimited tonnage endorsement.
 - ii. All tonnage limitations are removed when the applicant has six months of service on vessels of over 1600 gross tons in the highest grade endorsed. For other situations regarding the removal of the tonnage restriction, see 46 CFR 11.402(c).
 - b. When evaluating sea service on vessels measured under both regulatory and convention measurement systems, mariners may be credited with the ITC tonnage regardless of the nature of the voyages the vessel was engaged upon. Service will be credited under the ITC tonnage if the mariner submits service letters or other documentation that the vessel(s) served on were operated in accordance with the manning requirements applicable to the higher ITC tonnage at all times noted in the service letter or documentation.
 - c. In applying 46 CFR 11.402(a) when evaluating sea service, service on vessels of less than 3,000 GT will be considered equivalent to service on vessels less than 1,600 GRT for qualification for a license valid for any gross tons. Service on a vessel of 500 GT or less shall be considered equivalent to service on a vessel of 200 GRT or less.
 - d. If a mariner qualifies for a license for any gross tons with a tonnage limitation under 46 CFR 11.402, their license shall not be limited to less than 2,000 GRT or 4,000 GT.
5. ACTION.
 - a. The National Maritime Center (NMC) shall follow the guidance in this policy letter.

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b. Commanding Officers of units with marine safety responsibilities should bring this policy letter to the attention of the maritime industry in their area of responsibility.

c. This policy is posted along with other CG-543 policy letters on the Coast Guard's Homeport internet website at <http://homeport.uscg.mil> by selecting the following links: Library > Policy > Policy Letters > Inspection.

6. DISCLAIMER.

This document is intended to provide operational requirements for Coast Guard personnel and is not intended to nor does it impose legally-binding requirements on any party outside the Coast Guard.

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