

U.S. Department of  
Homeland Security

United States  
Coast Guard



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16721  
CG-MMC Policy Letter  
No. 01-16  
30 November 2016

From: M. Medina

COMDT (CG-MMC)

To: Distribution

Subj: RESTRICTED OPERATOR OF UNINSPECTED PASSENGER VESSELS (ROUPV)  
ENDORSEMENTS

Ref: (a) 46 CFR 11.467(g)  
(b) 46 CFR 10.225  
(c) 46 CFR 11.201

1. Purpose. Establish minimum requirements for, and provide guidance to Officers in Charge, Marine Inspection (OCMI) in determining appropriate qualifications for ROUPV endorsements within their Area of Responsibility (AOR).
2. Background.
  - a. In 2010 the Coast Guard published a policy to provide guidance to local OCMI's when determining appropriate route restrictions on MMC endorsements as Operator of Uninspected Passenger Vessels (OUPV) CG-543 Policy Letter 10-04. In 2013 the Coast Guard incorporated the policy into the regulations in Title 46 Code of Federal Regulations (CFR) 11.467. After publication of the regulations, the Coast Guard found that the regulations were not being implemented as intended. As a result, the Coast Guard is revising the policy to ensure that the OCMI's have improved guidance in making the determinations for route restrictions on OUPV endorsements.
3. Directives Affected. CG-543 Policy Letter 10-04 Restricted Endorsements for Merchant Mariner Credentials (MMC) as Operator of Uninspected Passenger Vessels (OUPV) is cancelled. Any credentials issued in accordance with that policy remain valid. Renewals will be reviewed in accordance with this policy.
4. Discussion.
  - a. Reference (a) allows for the issuance of ROUPV endorsements restricted to specific inland bodies of waters approved by the cognizant OCMI responsible for the geographic area. The OCMI may authorize a reduction in service and examination requirements in accordance with reference (a) and the guidelines below to qualify for an endorsement on the restricted route.

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b. The issuance of a restricted endorsement for an operator of uninspected passenger vessels should follow these steps:

- i. Persons or businesses desiring a restricted route must submit a request to the OCMI with responsibility for the geographic area.
- ii. After the OCMI determines the need for and appropriateness of the restricted route in accordance with subparagraph c, below; the OCMI will approve the restricted route.
- iii. Internal Coast Guard communication – The OCMI will notify the National Maritime Center (NMC) of the approval of the restricted route in accordance with subparagraph d below.
- iv. Public communication - the OCMI and NMC will notify the public of the restricted route in accordance with subparagraph e below.
- v. Mariner applies for a restricted endorsement in accordance with subparagraph f below.

c. Determination of a restricted endorsement route. OCMI should determine whether a particular waterway is an appropriate area of operation for a ROUPV endorsement (hereafter “restricted endorsement”). The process of approving a restricted endorsement for a geographical location is as follows:

- i. The OCMI should conduct a risk assessment of the proposed restricted geographic area. At a minimum, factors considered should include:
  - (a) Navigational complexity,
  - (b) Vessel traffic,
  - (c) Characteristics of the waterway,
  - (d) Industry input/involvement in reviewing the route,
  - (e) Casualty/incident data, and
  - (f) Availability of emergency resources in the immediate vicinity.
- ii. Based upon the risk assessment, the OCMI should determine if the restricted endorsement is warranted. The OCMI may establish a route of multiple waterways and or geographic areas within their AOR. The risk assessment should take into account the larger area.
- iii. The OCMI should also consider whether it is appropriate to lower the minimum age requirement for the restricted geographic area, in accordance with reference (c).

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- Generally, the age may be lowered to age 17. However for family-owned businesses, the OCMI may consider the appropriateness of lowering the minimum age to 16 for family members.
- iv. In cases where the age limit is reduced, applicants should be advised to consult the applicable laws for their jurisdiction with respect to the employment of minors in the transportation industry. Service may be accrued in accordance with 46 CFR 11.201(c)(6).
- d. Internal Coast Guard communication on the approval of the restriction. If the OCMI approves the restriction, they must notify the National Maritime Center (NMC), via their chain of command, of the approval. The notification must include a chart or map outlining the area's geographic restriction. The notification must also include:
- i. The minimum service requirement for the restricted endorsement. The minimum service permitted for this endorsement can be no less than 90 days on the type of vessel on inland routes with at least 30 days on the specific restricted route. The total time may be reduced to 30 days on the specific restricted route, when evaluated in conjunction with an approved course per 46 CFR 10.404(a);
  - ii. Appropriate language describing the geographic area covered by the restricted endorsement. This description will be printed on the MMC and should be clear and concise. Mariners and enforcement officials need to be able to readily determine the area of operation authorized by the credential; and
  - iii. Any training or examination requirements that may need to be incorporated for the restricted area in addition to the minimum required in paragraph 4.h. of this letter.
  - iv. A statement that removal of the restriction requires completion of full requirements for OUPV including all service and exam requirements.
  - v. Whether the OCMI has determined it appropriate to lower the minimum age requirement.
- e. Public communication from the OCMI and NMC about the restriction. It will be the decision of the cognizant OCMI to make any public notification to the state and local community of the restricted route approval. The NMC will maintain a list of the approved restricted endorsements on its website, [www.uscg.mil/nmc](http://www.uscg.mil/nmc).
- f. Mariner applications. Applicants for an MMC with an ROUPV endorsement may apply to the local Regional Examination Center (REC). If the REC receives an application for a restricted route that has not been established the mariner should be informed that he/she will need to apply for an unrestricted OUPV endorsement, or seek approval of the restricted route from the cognizant OCMI. The minimum requirements established below are found in references (a), (b), and (c).

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- i. A complete application for ROUPV endorsement must contain the following:
    - (a) A completed, signed application for merchant mariner credential (CG-719B)
    - (b) Proof that the mariner either holds a valid Transportation Worker Identification Credential or has enrolled for one. This is necessary in order for the Coast Guard to obtain the necessary biographic and biometric information necessary to issue a credential.
    - (c) Proof of completion of a Coast Guard approved or accepted first aid/CPR course.
    - (d) Documentary evidence of sufficient experience operating upon the approved geographic area. The minimum service will be determined by the OCMI, but in no case will it be less than 90 days, with at least 45 days within the previous 3 years. Where an applicant completes a course approved by the Coast Guard for the restricted route, the minimum service may be reduced consistent with the course approval.
    - (e) Evidence of having passed a chemical test for dangerous drugs or of qualifying for an exemption from testing in 46 CFR 16.220.
    - (f) Proof, documented on the application for merchant mariner medical certificate (CG-719K) form, of the applicant passing all applicable vision, hearing medical and/or physical exams as required by 46 CFR 10.301.
    - (g) An official oath as required by 46 CFR 10.225(b)(9).
    - (h) Consent to a Coast Guard review of the National Driver Register in accordance with 46 USC 7101(g).
  - ii. Evidence of family relationship for applicants who are 16 years of age.
  - iii. Completion of the required examinations set forth in the Examination Guidelines below, or proof of completion of an U.S. Coast Guard course approved for this restricted endorsement.
- g. Examination Guidelines. In accordance with 46 CFR 11.903, successful completion of a Coast Guard examination is required for an OUPV endorsement. Applicants may take the standard examination for OUPV or a Coast Guard approved course for OUPV; however a standard ROUPV examination has been developed considering the inland, uncharted, geographic waterways with no International Association of Lighthouse Authorities (IALA-B) buoyage system in place and with limited commercial vessel traffic.

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- h. The standard ROUPV examination consists of the following minimum requirements:
  - i. Rules of the Road – A minimum of 50 questions on Inland Rules of the Road. The minimum passing score will be considered 80%.
  - ii. Navigation and Deck General and Deck Safety – A minimum of 60 questions. The minimum passing score will be considered 70%.
- i. As an alternative, OCMI's who, after completing the risk assessment, determine that there should be a reconsideration of the minimum examination requirement. Should review the risk assessment against the examination requirements for OUPV – Inland and determine which items from that list are not appropriate for the restricted route being considered.
  - i. The OCMI should provide the analysis to the NMC to assist in creation of the route specific examination.
  - ii. The NMC will provide the examination to the REC for administration.
- j. OCMI's who have determined the need for additional examination requirements, beyond the minimum specified in paragraph h, must provide the information to and coordinate the examination development with the Training and Assessment Division at the National Maritime Center (NMC-2).
- k. General information on the administration of Coast Guard examinations for MMCs can be found on the NMC's website, [www.uscg.mil/nmc](http://www.uscg.mil/nmc).
- l. Endorsement renewal. All applicants for renewal should meet the minimum requirements established in 46 CFR 10.227, except the professional requirements of paragraph 46 CFR 10.227 (e)(1) may be modified as follows:
  - i. Completion no less than 90 days of service over the previous 5 years; or
  - ii. An open book renewal exercise for ROUPV or either a course for OUPV or a course specifically approved for the ROUPV endorsement held.

5. Action.

- a. All OCMI's and the NMC shall be guided by the information in this policy letter. Approved restricted endorsement routes should be posted on the cognizant OCMI's website as well as the NMC's website.
- b. Commanding Officers of units with marine safety responsibilities should bring this policy letter to the attention of the maritime industry and the appropriate state boating law administrators in their AOR.

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

6. Disclaimer:

a. This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on anyone. It represents the Coast Guard's current thinking on this topic. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach (you are not required to do so), you may contact Mr. Jim Cavo at 202-372-2357 who is responsible for implementing this guidance.

7. If you have questions or comments on this policy, you may contact the Mariner Credentialing Program Policy Division (CG-MMC-2) at [MMCpolicy@uscg.mil](mailto:MMCpolicy@uscg.mil) or call (202) 372-2357.

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