

U.S. Department of
Homeland Security

United States
Coast Guard



Director
National Vessel Documentation Center

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16713/5/3
July 21, 2025

Craig R. Gundry
Cormorant Maritime Projects
14501 SW 21st Street
Davie, Florida 33325

Dear Mr. Gundry:

This is in response to your email of May 27, 2025 requesting a determination pursuant to 46 C.F.R. § 67.177 that certain repairs performed in a shipyard in the Dominican Republic on the towing vessel OLIVER (Official Number 287211) do not adversely affect the coastwise eligibility of the subject vessel under 46 C.F.R. § 67.97.

Pursuant to our review of your submission and consistent with National Vessel Documentation Center ("NVDC") past practice, we requested a review and analysis of your request and supplemental materials by the Coast Guard's Naval Architecture Division ("NAD").

Upon review, NAD observed that the OLIVER is a small, 148 GRT twin-screw towing vessel built in 1961. The work performed in the Dominican Republic included cropping and replacing localized areas of hull plating and frames, welding repairs to the diesel, water, and air tanks, and painting the exterior hull with antifoulant paint. The routine maintenance performed did not involve modifications to the hull or superstructure. The preemptive steel replacements ensuring continued structural integrity of the vessel constitute "repairs-in-kind," because the replacement steel is the same as the original steel, and therefore, such replacements did not modify, alter, or add to the original hull or superstructure, or change the vessel's original flotation envelope.

In light of the foregoing, and based upon the information provided, I confirm that the repairs performed in a Dominican Republic shipyard does not adversely affect the U.S. build status of, and eligibility to operate in the coastwise trades of the United States upon completion, the towing vessel OLIVER.

Sincerely,

A handwritten signature in blue ink that reads "Christina G. Washburn".

Christina G. Washburn
Director