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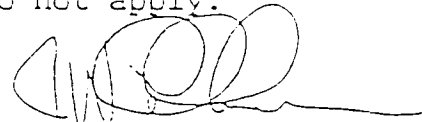
From: Commander, Eighth Coast Guard District  
To: Distribution

Subj: STCW APPLICABILITY TO MODUS

Ref: (a) International Convention on Standards of Training,  
Certificating and Watchkeeping (STCW), 1978

1. Enclosures (1) through (4), which discuss the applicability of the STCW to MODUs, are forwarded for your information.

2. In accordance with Article III of the subject convention, a non-self-propelled MODU does not meet the definition of a ship and therefore STCW requirements do not apply.



J. W. CALHOUN  
Ex direction

Encl: (1) COMDT (G-MSO-1) ltr 16712/9 of 4 Nov 96  
(2) International Registries, Inc ltr of 15 Nov 96  
(3) Vanuatu Maritime Services, Ltd ltr of 21 Nov 96  
(4) Republic of Panama, Directorate of Consular and  
Maritime Affairs ltr of 11 Dec 96

Dist: All Eighth District Gulf Region MSOs, MSU and MSDs

United States  
Coast Guard2100 SECOND STREET, S.W.  
Washington, DC 20593-0001  
Staff Symbol: G-MSO-1  
Phone: (202) 267-0213  
FAX: (202) 267-4570

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Mr. Alan Spackman  
Director, Offshore Technical and Regulatory Affairs  
International Association of Drilling Contractors  
P.O. Box 4287  
Houston, TX 77210-4287

Dear Mr. Spackman:

This is in response to your letter dated October 18, 1996, regarding the applicability of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW) to non-self-propelled vessels. The STCW Convention applies to seafarers serving on board seagoing ships. In the context of this Convention, we have always considered the traditional definition of the term "ship" to be a self-propelled vessel. Therefore, non-self-propelled mobile offshore drilling units (MODUs) would fall outside the scope of STCW and the personnel serving on board such vessels would not be required to comply with its requirements.

We hope this clarifies this matter for you. Should you have further questions or require additional information, please contact CDR Greg Jones of my staff at the above number.

Sincerely,

  
R. L. SKEWES  
Captain, U.S. Coast Guard  
Office of Operating and  
Environmental Standards  
By direction of the Commandant

# INTERNATIONAL REGISTRAR, INC.

11495 COMMERCE PARK DRIVE  
RESTON, VIRGINIA 22091  
TELEPHONE: (703) 620-4880  
TELEFAX: (703) 476-8522

TOWER 49  
12 EAST 49th STREET  
NEW YORK, NY 10017  
TELEPHONE: (212) 486  
TELEFAX: (212) 486-5311

November, 15, 1996

Mr. Alan Spackman  
Director, Offshore Technical and  
Regulatory Affairs  
International Association  
of Drilling Contractors  
P.O. Box 4287  
Houston, Texas 77210-4287

Re: Applicability of the STCW Convention

Dear Mr. Spackman:

This is to confirm that as administrators for both the Liberian and Marshall Islands registries, our view is that non-self-propelled vessels fall outside the scope of the 1978 STCW Convention, Amended 1995. This is based on IMO Resolution A.538(13), paragraph 2.4.1 which states that seafarers on board **self-propelled mobile offshore units** should meet the requirements of the STCW Convention, 1978.

Sincerely yours,



Captain James R. Norman  
Chief, Merchant Marine Officer Division

VANUATU MARITIME SERVICES LTD

90 WASHINGTON STREET, 22<sup>ND</sup> FLOOR

NEW YORK, NEW YORK 10006

TELEPHONE: 212-425-9600  
FACSIMILE: 212-425-9655  
TELEX: 229346 VAN MAR SVC.

November 21, 1996

MR. ALAN SPACKMAN  
DIRECTOR, OFFSHORE TECHNICAL AND  
REGULATORY AFFAIRS  
INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS  
P.O. BOX 4287  
HOUSTON, TX 77210-4287

Dear Mr. Spackman,

RE: APPLICABILITY OF THE STCW CONVENTION

I refer to your letter dated November 18, 1996 on the above subject.

Our interpretation of the STCW requirements is the same as that of the US Coast Guard relative to non-self propelled MODUs.

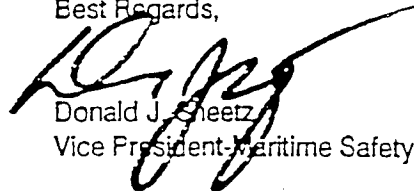
However, it has been a practice within the Vanuatu fleet to require that owners assign personnel aboard non-self propelled MODUs to be responsible for the operation of the survival craft -- lifeboats, liferafts, rescue boats, etc. These maritime personnel will be required to have the appropriate certification as ABs/Lifeboatmen.

All vessels in the fleet, whether self propelled or not, are issued Minimum Safe Manning Certificates. Currently these MSMCs require at least one certificated AB/Lifeboatman for every 2 survival craft on non-self propelled, but manned, vessels. We also require owners to assign one designated person in charge, be he a master, offshore installation manager, etc.; and, where radio communications equipment has been installed, and a radio station license has been issued, at least 1 (or 2, depending on the vessel) personnel with radiotelephone operator's licenses.

I trust that this answers your question.

On a different subject I will be in Houston for the next Navigation Safety Advisory Council meeting December 14 - 16, 1996. I am vice-chairman of that Coast Guard sponsored organization. I would like to meet with you and Alan Gustin on December 13, 1996 at your convenience. I will be calling next week to discuss.

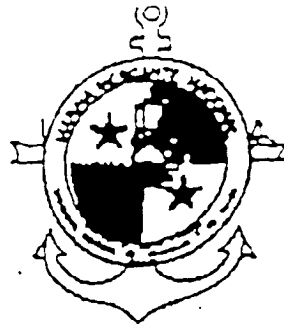
Best Regards,



Donald J. Sheetz  
Vice President-Maritime Safety

CC: Mr. Alan Gustin: See the last paragraph. Are you available?  
Marine Drilling Companies  
One Sugar Creek Center Blvd, Suite 600  
Sugar Land, Texas 77479-3556

DIRECTORATE OF  
CONSULAR AND MARITIME AFFAIRS  
NEW YORK REPRESENTATIVE OFFICE  
REPUBLIC OF PANAMA  
8 WEST 48th STREET - 10th FLOOR  
NEW YORK, NEW YORK 10036 U.S.A.



DATE 11 December 1996

No. of Pages 1.

TO : Mr. Alan Speckman  
Director, Offshore Technical and Regulatory Affairs, IADC

C.C. : Mr. Richard E. Haas, ROWAN Companies  
Chairman, Panama Offshore Industry Advisory Committee

FROM : CAPT. A.E. FLORE, Chief of Maritime Safety

SUBJ. : Applicability of the STCW Convention

REF. : YOUR REF:

This is to confirm that this Administration considers that the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended in 1995 does not apply to non-self-propelled vessels, hence, to non-self-propelled drilling rigs as well. The basis for this adopted policy by Panama is IMO Resolution A.538(13), paragraph 2.4.1 of the APPENDIX to subject Resolution which states that seafarers on board self-propelled mobile offshore units should meet the requirements of the STCW Convention, 1978.

Please notify all concerned parties accordingly.

Regards



TEL: (212) 869-6440 • FAX: (212) 575-2285 (212) 575-2288 • R.C.A: 238185-DMSRP, 276663-DMSRP