

**MTSA Regulations found at 33 CFR Subchapter H**  
**Part 104-VESSELS.**

**#32-04 JUN 17, 2004---POLICY ADVISORY COUNCIL FAQ**

**Q.** Is a Vessel Security Plan required for two T-Boats coupled together if the aggregate passenger capacity exceeds 150 persons?

**Ans.** The OCMI should issue a COI for the composite unit with the passenger capacity specified as the aggregate capacity. For those vessels whose aggregate capacity exceeds 150 persons, a VSP is required.

G-M may pursue a regulatory change to 33 CFR Part 104 to add the word “aggregate”.

This decision will have an impact on inspections for certifications of these vessels, the individual T-Boats, and the aggregate unit which would be certificated under the applicable Subchapter (most probably Subchapter K or H). G-MOC, working with G-MSE and G-MSD, will issue a policy letter on how OCMI's should address the structural and operational issues of this composite unit.

In addition, this decision will impact those facilities that receive these coupled vessels. Vessels that are certificated to carry more than 150 passengers must utilize facilities that meet the requirements of 33 CFR Part 105 when embarkation and debarkation of passengers occurs.

**Note:** For further guidance, a facility owner/operator should contact their local Captain of the Port (COTP/FMSC).