



16711/Serial No. 188  
CG-CVC Policy Letter 19-02  
12 Jul 2019

A handwritten signature in blue ink, appearing to read "J. J. Hudson".

From: J. J. Hudson  
Acting COMDT (CG-CVC)

To: Distribution

Subj: GUIDANCE ON THE ENFORCEMENT OF RADAR OBSERVER REQUIREMENTS PRIOR  
TO 22 JULY 2019

Ref: (a) Title 46, Code of Federal Regulations (CFR), Section 11.480  
(b) Title 46, Code of Federal Regulations (CFR), Section 15.815(d)-(e)  
(c) 84 Federal Register (FR) 26580, Docket No. USCG-2018-0100  
(d) COMDT (CG-MMC) Policy Letter No. 03-19

1. PURPOSE. The purpose of this policy letter is to provide clarification and guidance for Officers in Charge, Marine Inspection (OCMI) and the marine industry regarding the enforcement of 46 CFR 11.480, reference (a), or 46 CFR 15.815(d)-(e), reference (b), prior to the implementation of 84 FR 26580, reference (c).
2. DIRECTIVES AFFECTED. None.
3. BACKGROUND.
  - a. On June 7, 2019, the Coast Guard published a Final Rule titled *Amendments to the Marine Radar Observer Refresher Training Regulations* at 84 FR 26580. The purpose of this rule is to revise merchant mariner credentialing and vessel manning regulations to remove obsolete portions of the radar observer requirements and harmonize the radar observer endorsement with the merchant mariner credential.
  - b. This rule allows mariners to meet the renewal requirements for a radar observer endorsement through appropriate sea service or teaching of Coast Guard-approved radar courses. These mariners will no longer be required to complete a course in order to renew their endorsement.
  - c. CG-MMC Policy Letter No. 03-19, reference (d), outlines National Maritime Center guidance for the evaluation of continued mariner radar observer proficiency.
4. DISCUSSION. Some mariners hold radar course completion certificates that have expired, or will expire before July 22, 2019. Under strict interpretation of the current 46 CFR 15.815(d), these mariners may be required to provide a course completion certificate to prove the validity of their existing radar observer endorsement. This potential action would go against the purpose and intent of this rulemaking.
5. ACTION. Mariners will be considered in compliance with radar observer requirements in 46 CFR 15.815 if they hold a valid Merchant Mariner Credential (MMC) containing the appropriate

endorsement as Radar Observer. Mariners should not be required to provide training certificates to show their Radar Observer endorsement is current and valid.

6. CANCELLATION. This policy letter will expire on July 22, 2019 which is the implementation date of the *Amendments to the Marine Radar Observer Refresher Training Regulations* Final Rule.
7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS. Environmental considerations were examined in the development of this policy letter and have been determined not to be applicable.
8. DISCLAIMER. This policy letter guidance is neither a substitute for applicable legal requirements, nor a regulation. It is not intended nor does it impose legally-binding requirements on any party. It represents the Coast Guard's current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other Federal and state regulators, in applying statutory and regulatory requirements. An alternative approach may be used for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations.
9. QUESTIONS. Questions concerning this policy letter and guidance should be directed to Office of Commercial Vessel Compliance, COMDT (CG-CVC), Domestic Compliance Division at [CG-CVC@uscg.mil](mailto:CG-CVC@uscg.mil).

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