

U.S. Department of
Homeland Security

United States
Coast Guard



Director
National Vessel Documentation Center

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16713/5/2
November 21, 2017

Jonathan K. Waldron, Esq.
Blank Rome LLP
1825 Eye Street NW
Washington, DC 20006

Dear Mr. Waldron:

I am writing in response to your letter with enclosures dated August 18, 2017 with regard to the fishing vessel BLUE NORTH, official number 1252306, built by Dakota Creek Industries, Inc. This vessel was delivered to its current owner in 2016 and documented with fishery and coastwise endorsements (the "Vessel"). At the request of our office, you submitted information sufficient to allow us to verify and confirm that the vessel qualifies as having been built in the United States. Questions had arisen concerning its qualification as built in the United States when it came to light that foreign-sourced cold molded compound curvature plates had been used in the construction of the Vessel similar to those used in another vessel then under construction by Dakota Creek Industries, Inc., the fishing vessel AMERICA'S FINEST. The AMERICA'S FINEST was the subject of a determination by our office dated August 31, 2017 which found that by virtue of the quantity of such foreign-sourced steel plates used in the construction of that vessel, it would not qualify as built in the United States. Consequently, it would not qualify to be documented with fishery or coastwise endorsements.

As is our standard procedure, the information you submitted was referred to the Coast Guard's Naval Architecture Division ("NAD") for preliminary analysis and fact-finding. That analysis is now complete and I can report to you that the NAD analysis has confirmed the conclusion of your submission; specifically, that the use of fabricated foreign-sourced steel in the hull and superstructure of the Vessel amounted to less than 1.5% of the discounted lightship steel weight of the Vessel. Thus, it did not exceed the regulatory standard for vessels deemed to have been built in the United States.

For this reason I have determined and report to you that we have no cause to further question the status of the Vessel as built in the United States. This inquiry is now concluded and I offer my thanks for your cooperation.

Sincerely,

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

Christina Washburn
Director