



16713/5/2
December 16, 2015

Francis X. Nolan, III Esq.
Vedder Price
1633 Broadway, 47th Floor
New York, NY 10019

Dear Mr. Nolan:

I refer to your letter of November 16, 2015, on behalf of your client, Dredge Technology Corporation and its Netherlands affiliates, by which you described a project to design and build cutter suction dredges. As described, certain modules and other equipment would be fabricated outside of the United States and incorporated into the vessels in the U.S. shipyard where the vessels themselves will be constructed. Specifically, your letter has described the following non-U.S.-manufactured modules and equipment:

- (i) A spud carriage pontoon, which will ride on wheels in a well of the dredge and be removable from the dredge, and ladders, described as excavator tools of the dredge attached by means of removable trunnions;
- (ii) One portable office and one or more accommodation units in standard 20 foot container sizes, designed for use either on board or on shore, which can be loaded on deck and secured by either twist locks or bolts; and
- (iii) One or more integrated machinery modules which will include the diesel engine for the dredge pump and related auxiliary machinery and electrical and piping systems and which will be bolted (not welded) to the main deck inside the superstructure.

You have sought confirmation that the addition of the aforementioned non-U.S.-manufactured items to the vessels in the U.S. shipyard where the vessels will be constructed will not adversely affect the status of the completed vessels as built in the U.S. and, as such, eligible to be documented with coastwise endorsements.

Your letter and its enclosures were referred to the Coast Guard's Naval Architecture Division ("NAD") for its review of the implications of your proposal for the hull and superstructure of the vessels and I have received and incorporated its analysis into this determination. I also take note of the following past determination letters issued to you: (i) letter dated September 30, 1994, which addressed non-U.S.-manufactured spud carriage pontoons and moveable ladders; and (ii) letter dated September 15, 2009, written to you on behalf of the same client represented in this case, which addressed the incorporation of certain non-U.S. manufactured machinery modules.

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Based upon the findings of the NAD, and in light of the past determination letters referred to above, I find nothing in your current proposal which materially varies from those earlier proposals or that would cause me to arrive at a different conclusion than the conclusions reached in those instances. Consequently, I confirm that the incorporation of the non-U.S. manufactured items described above into the cutter suction dredges to be built in a shipyard of the United States, as long as the assembly is all done in the United States, will not adversely affect the status of those dredges as built in the United States.

Sincerely,



TIMOTHY V. SKUBY
CAPT, USCG Retired
Director