



16713/5/2
February 7, 2024

Mohamed Mohamed
Neptune Americas & Marine Corporation
1001 S Dairy Ashford Road, Suite 250
Houston, TX 77077

Dear Mr. Mohamed:

I refer to your letter of December 4, 2023, in which you described a project to build non-self-propelled cutter suction pontoon dredges in the United States. You provided additional details in your email of January 18, 2024.

As described, each dredge will comprise of three hull pontoons (a centerline pontoon and port/starboard pontoons), to which modules and other equipment items will be attached. The pontoons will be fabricated in the United States, but certain items will be fabricated outside of the United States. However, all pontoons and components will be fully assembled in a U.S. shipyard.

Your letter described the following non-U.S.-manufactured components and equipment:

- i. A modular "sanitary room" that houses a toilet, handwashing station, and a desk. This will be bolted onto the main deck of the center pontoon;
- ii. A modular single-seat "control cabin" for the operator, outfitted with all dredge controls. This will be bolted atop the sanitary room module, accessed by a bolted stairway from the main deck; and;
- iii. A hinged cutter "ladder" pinned to the centerline pontoon hull that supports the suction cutter head and associated outfitting items.

You seek 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.

The regulatory standard for vessels deemed to have been built in the United States is found at 46 CFR § 67.97, and comprises of two tests:

- (1) All major components of its hull and superstructure¹ are fabricated in the United States; and
- (2) The vessel is assembled entirely in the United States.

¹Per the definitions in 46 CFR § 67.3, "hull" includes shell plating and internal & external structural components, and also flotation envelope components; and "superstructure" means the main deck and any structure above.

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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.


Accordingly, the modules and cutter ladder described above are not considered integral to the hull or superstructure and will not contribute to the overall structural integrity of the vessel or its watertight (flotation) envelope.

I also take note of the following past determination letters for dredges of similar construction and non-U.S.-manufactured components: (i) our letter dated September 30, 1994, which addressed removeable cutter ladders; (ii) our letter dated September 15, 2009, which addressed the incorporation of machinery modules, and (iii) our letter dated December 16, 2015, which addressed portable office and accommodations units.

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 pontoon dredges to be built in a shipyard of the United States, provided 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,



Christina G. Washburn
Director