



16713/5/2
October 24, 2023

Mr. Jonathan K. Waldron, Esq.
Blank Rome
1825 Eye Street NW
Washington, D.C. 20006

Dear Mr. Waldron:

I am writing in response to your letter of September 12, 2023, requesting confirmation that construction of a Subsea Rock Installation Vessel (the "Vessel") with certain foreign-built components will not negatively affect its eligibility for a Certificate of Documentation endorsed for coastwise trade. You also requested confirmation that the use of shipbuilding bulb flats would not be included in the component calculations of the combined steel weight of the Vessel.

We referred your letter and its attachments to the Coast Guard's Naval Architecture Division ("NAD") for their review and analysis and for use in our final determination. The NAD's review focused on making a reasonable determination of the discounted steel weight of the Vessel pursuant to 46 C.F.R. 67.3 and evaluated the weight of those foreign source steel components included in the total 1.5% U.S. build weight limit. The NAD found your estimate of the discounted steel weight of the Vessel of 6,503.2 Mtons to be acceptable and I accept that finding for the purpose of this determination.

Your letter indicates that the shipbuilder will incorporate thirteen different types of foreign-built components of the hull. Those components and their respective weights are:

- | | |
|---|----------|
| 1. Bow Thruster Housings | (3.3 t) |
| 2. Azimuth Thruster Extended Housing | (9.0 t) |
| 3. Retractable Thruster Vertical Tunnel w/ "Casing Plate" | (9.7 t) |
| 4. Retractable Thruster Vertical Seal | (8.0 t) |
| 5. 90 mm Excavator Foundation Full Plate Ring | (11.1 t) |
| 6. Anchor Pockets | (24.0 t) |
| 7. 120 mm Pad-Eyes | (4.7 t) |
| 8. 120 mm Shear Plate | (0.7 t) |
| 9. Wedge for Rock Hold Side Hatch | (0.6 t) |
| 10. Doors on Exposed Decks | (3.6 t) |
| 11. Hatches on Exposed Decks | (6.3 t) |

16713/5/2
October 24, 2023

12. Ventilator Covers on Exposed Decks

(1.6 t)

13. Manholes on Exposed Decks

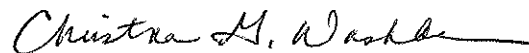
(1.3 t)

The total weight of the foreign-built components is 83.9 Mtons. Based upon the discounted steel weight of 6,503.2 Mtons, the allowable 1.5% foreign steel component weight limit for a U.S. build determination is 97.6 Mtons. As the total foreign component weight is 83.9 Mtons, this is within the allowable limit.

Finally, I note that an unspecified amount of foreign "bulb flats" stock from a Turkish steel mill will be used in the construction. However, these will be delivered from the mill in the original unworked condition; therefore, their weight is not included in the foreign weight limit. This is in accordance with many prior determinations and firmly established precedent.

Based upon these findings, including the information you provided, I confirm that the construction of the Vessel in the manner described will not negatively affect its status as being U.S. built. Accordingly, the Vessel will be eligible to be documented with a Certificate of Documentation endorsed for coastwise trade.

Sincerely,



Christina G. Washburn
Director