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CG-CVC Policy Letter
No. 14-03

From: 
CAPT K. P. MCAVOY
COMDT (CG-CVC)

To: Distribution

Subj: EVALUATING SEA SERVICE ABOARD LIFTBOATS

Ref: (a) Title 46, Code of Federal Regulations (46 CFR), Section 11.201(l)
(b) 46 CFR Section 11.211(g)

1. **PURPOSE.** This policy letter describes policy for evaluating and crediting sea service aboard liftboats used to qualify for national officer endorsements on Merchant Mariner Credentials (MMCs).
2. **DIRECTIVES AFFECTED.** Those portions of National Maritime Center (NMC) Policy Letter 09-01, *Evaluating Experience Aboard Commercial Vessels That Do Not Get Underway or That Get Underway for Only Limited Periods* that address service aboard liftboats, is superseded by this Policy Letter. The remaining portions of P.L. 09-01 have been addressed in regulation. As such, P.L. 09-01 is hereby cancelled. This policy letter will be included in the next revision of Volume III of the Marine Safety Manual.
3. **BACKGROUND.**
 - a. Liftboats spend significant periods elevated at work sites and are not underway at those times. The time a liftboat spends underway is generally limited to travelling to and from a job site, and may be a relatively small portion of the total time the liftboat is in operation.
 - b. An offshore supply vessel (OSV) is defined in 46 U.S.C. 2101 (19) as "a motor vessel... that regularly carries goods, supplies, individuals in addition to crew, or equipment in the support of exploration, exploitation, or production of offshore mineral or energy resources." By this definition, OSVs include, but are not limited to, liftboats.
 - c. In April of 2001, the Coast Guard published NMC Policy Letter 09-01 describing policy for crediting sea service on vessels that may spend a significant amount of their time moored. That policy letter addressed evaluating service obtained on several types of vessels, including liftboats.
 - d. On December 24, 2013, the Coast Guard published a final rule in the Federal Register (78 FR 77796) that implemented the International Convention on Standards of Training,

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Certification and Watchkeeping for Seafarers, 1978 and made changes applicable to national endorsements. The rule became effective on March 24, 2014, and it included changes to requirements for national officer endorsements, including those for service on OSVs.

- e. As specified in reference (a), the Coast Guard may modify the service and examination requirements for merchant mariner officer endorsements for a distinct group of mariners. When such modifications are made, the authority granted by the officer endorsement will be restricted to reflect any modifications made under the authority of 46 CFR 11.201(i). Furthermore, reference (b) allows sea service performed on unique vessels to be evaluated by the Coast Guard for a determination of its equivalency to traditional service.

4. DISCUSSION.

a. Deck Officer Endorsements Restricted to Service on Liftboats.

- 1) The Coast Guard considers liftboats to be unique vessels for the purpose of crediting sea service. The Coast Guard will evaluate sea service on “unique vessels” for a determination of equivalence to traditional service. In recognition of the unique operations of liftboats, the Coast Guard will issue the following national officer endorsements with a restriction to service on liftboats:
 - Master (OSV) (46 CFR 11.493);
 - Chief Mate (OSV) (46 CFR 11.495); and
 - Mate (OSV) (46 CFR 11.497).
- 2) While mariners must generally meet all requirements for the non-restricted endorsements described in 46 CFR 11.493, 11.495, and/or 11.497, to qualify for the liftboat restricted endorsements, the Coast Guard will recognize liftboat sea service as follows: sea service obtained on liftboats may be used for all of the required service and will be credited at 1:1 or day-for-day (1 day of service credit for each day served) without regard to whether the liftboat was underway or elevated at the time of service.
- 3) For renewal of any MMC deck officer endorsement, including endorsements restricted to liftboats, service on liftboats may be used for all of the required service and will be credited day-for-day without regard to whether the liftboat was underway or elevated at the time of service.

b. Deck Officer Endorsements Without Restriction to Liftboats.

- 1) Service on liftboats will also be credited towards deck officer endorsements that are not restricted to service on liftboats. In this case, service will be credited on a day-for-day (1:1) basis on days when the vessel is underway.

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- 2) Service on liftboats obtained when elevated and in normal operation will be credited at 1:2 (1 day of credited service for 2 days served) for up to 50% of the required service.
 - 3) For renewal of any deck officer endorsement, liftboat service may be used for all of the required service and will be credited day-for-day without regard to whether the liftboat was underway or elevated at the time of service.
- c. Removal of Liftboat Restriction. Mariners seeking to remove a liftboat restriction from their endorsement must meet the full service and training requirements for their endorsement described in 46 CFR 11.493, 11.495, and/or 11.497, as appropriate. Service acquired while serving aboard liftboats may be used towards obtaining an endorsement without restriction to liftboats as described above in paragraph 4.b.
- d. Engineer Officer Endorsements.
- 1) As discussed above, the Coast Guard considers liftboats to be unique vessels. Under 46 CFR 11.211(g), the Coast Guard has determined that engine service on an elevated liftboat when the engineering plant is operational is equivalent to underway service on OSVs. Service on liftboats may be credited for national engineer officer endorsements at 1:1 or day-for-day for each day the engineering plant is operational without regard to whether the vessel is underway or elevated.
 - 2) Service on days when the engineering plant is not operational will be credited at 1:2 (1 day of credited service for 2 days of served) for up to 6 months of the required service.
 - 3) For renewal of any engineering officer endorsement, liftboat service may be used for all of the required service and will be credited day for day without regard to whether the liftboat was underway or elevated at the time of service.
5. ACTION.
- a. The National Maritime Center (NMC) and all OCMI's shall be guided by the information in this policy letter.
 - b. Commanding Officers of units with marine safety responsibilities should bring this policy letter to the attention of the maritime industry in their areas of responsibility.
 - c. This policy is posted along with other CG-CVC policy letters on the Coast Guard's Homeport internet website at <http://homeport.uscg.mil> by selecting the following links: Library > Policy > Policy Letters > Inspection.
6. DISCLAIMER.
- a. This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard's current thinking on this topic. You can use an alternative

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approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach (you are not required to do so), you may contact the Mariner Credentialing Program Policy Division at 202-372-2357 or MMCPolicy@uscg.mil.

- b. This guidance has been thoroughly reviewed by the originating office in conjunction with the Office of Environmental Management, and is categorically excluded (CE) under current USCG CE # 33 from further environmental analysis, in accordance with Section 2.B.2. and Figure 2-1 of the National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts, COMDTINST M16475.1 (series). Coast Guard categorical exclusion #33 applies when guidance implements, without substantive change, the applicable Commandant Instruction or other federal agency regulations, procedures, manuals, and other guidance documents. This guidance will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment.
7. QUESTIONS. All questions regarding implementation of this NVIC should be directed to the Mariner Credentialing Program Policy Division (CG-CVC-4), at (202) 372-2357 or MMCPolicy@uscg.mil.

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