141-001
The OCMI should not routinely require specialized or additional lifesaving equipment. Vessel operators who use the TSMS option should specify what specialized or additional equipment is needed in their TSMS and have it approved by a TPO.

46 CFR §141.225 discusses alternate arrangements and includes discussion under §141.225(d), which allows the cognizant OCMI to require towing vessels to carry specialized or additional lifesaving equipment based on if (1) the conditions of the voyage render the requirements inadequate, or (2) the towing vessel operates in a globally remote area which experiences severe environments.
Received June 2016
Answered 4 August 2017, updated 07 October 2020

141-002
Using flares as visual distress signals is problematic for vessels on the Western Rivers that operate in urban areas for security, safety, and environmental reasons, and training is impracticable. Is it possible for vessel operators utilizing the TSMS option to use alternative means to comply with this requirement?

The Coast Guard will accept alternative visual distress signals, provided that the owner or managing operator can provide independent evidence that the signal provides a level of detectability in the marine environment, equivalent to an approved flare.
While flares are a possible source of ignition, they are required to be stored in a safe manner as outlined in 46 CFR §141.375(e). We have no data to suggest that flares would pose a greater risk on towing vessels than any other class of inspected vessel (tank vessels carrying flammable cargoes, etc.). We do not have any applicable data to answer the second question (confirmed by CG-INV). Carrying visual distress signals has been an emergency equipment requirement for decades on towing vessels inspected under Subchapter I.
Received June 2016
Answered 28 December 2016, update 07 October 2020

141-003

(1) Where do I find the requirements for survival craft and what towing vessels are required to carry them?

(2) How many and what type of survival craft am I required to carry?

(1) See 46 CFR §141.305 for survival craft carriage requirements for inspected towing vessels (ITV). All towing vessels must carry survival craft, unless:

1. They operate solely in Limited Geographical Areas or Protected Waters, AND their cognizant OCMI or associated TSMS does not require it.
2. They operate solely on a rivers route, their cognizant OCMI or associated TSMS does not require it; AND
    a. It carries a 406 MHz Cat 1 EPIRB meeting 47 CFR part 80;
    b. It is designed for pushing ahead and has a TSMS that contains procedures for evacuating crewmembers onto the tow or other safe location; OR
    c. It operates within 1 mile of shore.

In other words, ITVs operating solely on a rivers route and within 1 mile from shore are generally not required to carry survival craft*. Recognize that your COI routes and conditions will be limited to operating on a rivers route and not further than 1 mile from shore.

*Although unlikely, the cognizant OCMI or TSMS TPO may require survival craft in certain circumstances based on operating conditions and/or other specific hazards in a vessel's area of operation.

(2) The minimum capacity and type of survival craft that must be carried on board an ITV can be found in 46 CFR Table 141.305.

Where Table 141.305 indicates "100%", the towing vessel must carry survival craft with enough capacity for all of the persons on board. The required minimum capacity can be met with one or more craft.

Survival craft are ranked in a hierarchy, as follows (from lowest to highest):

a. Inflatable buoyant apparatus
b. Inflatable life raft
c. Lifeboat

A survival craft of higher 'rank' may be substituted, as outlined in 46 CFR §141.305(d)(2).

What if I want to use a skiff instead of a survival craft?:

46 CFR §141.330 allows skiffs to be substituted for all or part of an ITV's required survival craft if:

a. The ITV does not operate more than 3 miles from shore, AND
b. The skiffs meet all operating and loading requirements specified in that section.

NOTE

If a skiff or skiffs are used as all or part of the required survival craft, the combined carriage capacity of the skiff(s) and survival craft(s), if applicable, must be enough to safely accommodate (46 CFR §141.330(a) through (f)) all persons on board.

If only one skiff is used as a substitute for all required survival craft, it must be capable of holding all persons on board safely as outlined in 46 CFR §141.330(a) through (f).

Received June 2016

Answered 22 November 2016, updated 07 October 2020

141-004
If I'm reading correctly, Type I PFDs have to have a light and whistle, and Type II, III or V (work vest) is only required to have a light. Our man overboard transmitters that are attached to our work vest are water activated. Could these be considered an alternative for the lights? The lights would be one more thing to get snagged.

The Coast Guard (CG-ENG-4) would be willing to evaluate these transmitters to determine equivalency to an approved PFD light. In order to make this determination, we would need to know what is needed in order to receive the transmission. In other words, everyone on the water should be able to see a light, so if the transmitter's signal can only be received by the vessel that the person fell off of, that will not be sufficient to demonstrate equivalency.
Received July 2016
Answered 28 December 2016

141-005
Vessels that operate on inland rivers are required to carry 3 day and 3 night visual distress signals. If we opt to carry signals that are approved as both day and night signals, would we need to carry 3 or 6?

Three day/night signals would satisfy the requirement.
Received July 2016
Answered 28 December 2016

141-006
The requirement for reflective material on lifejackets does not also include the vessel name, correct?

Correct, vessel name does not have to be reflective. §§ 141.340(f)(1) and 141.340(f)(2) are independent of one another.
Received 27 July 2016
Answered 28 December 2016, updated 07 October 2020

141-007
Is a skiff required to hold the entire crew compliment?

The towing vessel must have survival craft capacity for all persons on board. If the skiff is the only survival craft, then it must have capacity for all POB.
For more information on survival craft requirements, please see FAQ 141-003.
Received 21 June 2016
Answered 28 December 2016

141-009
Should lifeboat requirements apply to brown water vessels? Had there been an incident where crewmembers lost their lives because they were unable to get off the boat?

Coast Guard HQ is assuming this question is related to the carriage of any survival craft not only lifeboats, as the question is written. There are no lifeboat carriage requirements within Subchapter M although approved lifeboats may be substituted for the required survival craft in accordance with 46 CFR §141.305(d)(2)(i).

Regarding the carriage of survival craft in general, 46 CFR §141.305(d)(3) already stipulates that survival craft need not be carried on towing vessels operating solely on rivers if any one of the three following conditions are met:

1) Carriage of a 406 MHz Cat 1 EPIRB;
2) Towing vessel is designed for pushing ahead and the TSMS adequately addresses procedures for evacuating crewmembers onto the tow or other safe location; OR
3) The vessel operates within 1 mile from shore.

This section of the regulation does allow for the cognizant OCMI or the TSMS applicable to the vessel to determine, based on local conditions, that there may be a need to carry survival craft even if the above mentioned conditions are met.

See also: FAQs 141-003 and 141-010.
Received 9 August 2016
Answered 21 June 2017

141-010
Should there be an "or" after the EPIRB exemption clause or is that to mean the both (i) and (ii) must be satisfied?

The intent is that one of the three options ((i), (ii), OR (iii)) must be satisfied in order to meet 46 CFR §141.305(d)(3).
Received 7 October 2016
Answered 28 December 2016, updated 07 October 2020

141-011
When discussing limited geographic areas in 46 CFR §141.375(d), do you mean 30 minutes away from their dock or 30 minutes away from a dock?

The intent of this exemption is to limit travel to 30 minutes away from an ITV's dock of origin, not any dock.
Received 7 October 2016
Answered 28 December 2016

141-012
Will due consideration for carriage of survival craft on vessels operating on Lakes, bays and sounds be given to areas with shallow depths? There are areas on the Gulf Intracoastal Canal where a vessel may operate more than 3 nm from shore, but the water depth is such that if the vessel "sank" it would still not be submerged. If the COI is issued in Sector Ohio Valley, would the OCMI understand the conditions which the boat may operate in OCMI Corpus Christi?

Water depth is not a consideration given to the exemption of survival craft on vessels.

The rulemaking defined the entire Gulf Intracoastal Waterway, as well as other inland waterways defined in 33 CFR §§ 89.25 and 89.27, as a river route regardless of the depth or distance from shore. Therefore, the owner or managing operator should indicate on their application for inspection the routes that they intend to operate which will be used by the OCMI to determine the appropriate lifesaving requirements. The OCMI retains authority to evaluate designations of the waters within their zone.
Received October 2016
Answered 2 December 2016, updated 07 October 2020

141-013
Are flares a good idea on tows carrying highly flammable cargoes? Has there been a SAR case on an inland towing vessel where a flare/VDS would have been an asset?

While flares are a possible source of ignition, they are required to be stored in a safe manner as outlined in 46 CFR §141.375(e). We have no data to suggest that flares would pose a greater risk on towing vessels than any other class of inspected vessel (tank vessels carrying flammable cargoes, etc.). We do not have any applicable data to answer the second question (confirmed by CG-INV). Carrying visual distress signals has been an emergency equipment requirement for decades on towing vessels inspected under Subchapter I.
Received October 2016
Answered 22 November 2016, updated on 07 October 2020

141-014
Reading your answer to question 141-003, it seems to imply that an inflatable buoyant apparatus is the lowest level of primary lifesaving allowed. According to Table 141.305, Buoyant Apparatus (rigid BA) are allowed for "warm water" operations. I believe many inland operators will choose this option because their skiff capacity may not cover full POBs and the vessels cross bays that are >3 miles from shore.

Can you please clarify that rigid buoyant apparatus are an option for towing vessels operating in warm waters?

A rigid buoyant apparatus is authorized onboard inspected towing vessels for use as a survival craft based on three criteria: water temperature (warm); route; and distance from shore. However, the towing vessel must be equipped per the requirements of its certificated route.

A rigid buoyant apparatus can be used for warm water operations on the following routes: Rivers, Great Lakes, and Lakes, Bays and Sounds at any distance from shore, as well as Coastwise and limited Coastwise ≤3 miles from shore.

In addition, warm water is defined as water where the monthly mean low water temperature is normally more than 15 degrees Celsius (59 degrees Fahrenheit), as determined by the OCMI. See NVIC 7-91, Determination of Cold Water Areas for further information.
Received 27 January 2017
Answered 3 July 2017, updated 07 October 2020

141-015
46 CFR §141.360(c)(1) states that if more than one lifebuoy is carried on a vessel, one must NOT have a lifeline attached. What is the rationale behind this thinking? The primary reason for the lifebuoy is to assist the victim in staying afloat and the lifeline is to provide the means to bring the victim back to the vessel and to safety. If there is no lifeline, the victim may indeed float downstream, away from any help.

This is consistent with the requirements for other inspected vessels; Subchapter T: 46 CFR §180.70(c) and Subchapter K: 46 CFR §117.70(c). The possibility of line fouling is why there is a requirement for one life ring to not have a life line. Having a lifebuoy with and one without a lifeline gives mariners quick options for the prevailing conditions. For further information see the Supplemental Notice of Proposed Rulemaking, SNPRM, for Subchapters T and K.
Received 1 March 2017
Answered 4 December 2017, updated 07 October 2020

141-016
46 CFR §141.340(f)(1) states that lifejackets must be marked with the name of the vessel in block capital letters. The Type I life jackets utilized on our vessel are made with a fabric covering the floatation medium. They can be very easily marked by the use of a permanent type of marker that may not be exactly in block letters. If the name of the vessel can be read, doesn't that meet the intent of the law?

Yes, 46 CFR §141.340(f)(1) states that lifejackets must be marked with the name of the vessel in block capital letters. If the medium used for this purpose will not wash away in water and the vessel's name is legible, it would meet the intent of this requirement. Two inch stencils and spray paint are commonly used to accomplish this.
Received 1 March 2017
Answered 3 July 2017, updated 07 October 2020

141-017
46 CFR §141.360(c)(3) requires a floating electric water light. Does this water light have to be water activated or can a manually operated light suffice? Also, the only approved water activated floating lights for ring buoys are very large and heavy. It is difficult enough to throw a 24" to 30": life ring to a victim in the water, but adding another three pounds of light and batteries on a lanyard will be even more difficult. To be practical, wouldn't a water activated light similar to the light required on a Type I life vest be more practical and safer for the victim and the rescuer?

46 CFR §141.360(c)(2) and (3) defines the requirements for floating electric lights to be attached to lifebuoys carried onboard towing vessels. These requirements also state that light is to be attached with a corrosion resistant clip for quick disconnect, not permanently attached to the lifebuoy. The lights are required to be type approved under approval series 46 CFR §161.010, which states the lights must meet UL/ANSI 1196. This standard requires that the light automatically emit light when in the water; therefore, a manually operated light is not sufficient.
Received 6 March 2017
Answered 17 September 2019, updated 07 October 2020

141-018
If for example a ring buoy light is SOLAS approved but is not stated as USCG approved, is it acceptable to use?

No, 46 CFR §141.200 requires all lifesaving equipment on U.S. Flag towing vessels to be Coast Guard Type Approved, unless otherwise specified in the regulations. Given the example of a floating electric water light (ring buoy light), 46 CFR §141.360(c)(2) requires the light to be approved under approval series 161.010 or 161.110.
Received 9 May 2017
Answered 4 August 2017, updated 07 October 2020