

P-001**When will the USCG “additional guidance” be issued and how will that occur?**

The Coast Guard continually develops guidance and updates on a number of topics to include TPOs and compliance with Subchapter M.

The Towing Vessel National Center of Expertise’s website (<https://www.dco.uscg.mil/tvncoe/>) offers links to frequently asked questions, and links to policies and guidance. This site will be updated periodically to include answers to questions received from the industry and public.

Received Aug 2016**Answered 23 Nov 2016, updated 14 May 2018, updated 06 October 2020****P-002****If I’m conducting a crew change and receiving monetary benefits, would that be considered a passenger-for-hire situation?**

It may, but this will require evaluation and a determination by the cognizant OCMI.

This topic is discussed in the Preamble to the regulation, middle column of page 40013: the Coast Guard notes that towing vessels that carry cargo for hire, or conduct other regulated activities—such as carrying passengers for hire, would likely be subject to regulations contained in other subchapters. Vessels engaged in two (or more) separate regulated activities are referred to as being in “dual (or multiple) service.” Towing vessels that want to conduct activities other than just towing need to seek approval from the OCMI issuing the COI.

Numerous parameters, including vessel characteristics and the operations conducted by the vessel, would determine under which vessel type the vessel would be inspected.

In accordance with 46 U.S. Code §3304, a towing vessel which exceeds persons in addition to crew totals of 12 for international voyages and 16 for domestic voyages would be subject to inspection as a passenger vessel or small passenger vessel.

For further discussion on persons in addition to crew see FAQs G-027 and G-031.

Received 9 Aug 2016**Answered 11 Apr 2017, updated 06 October 2020**