

## Submit complete information:

If the information provided is insufficient to show compliance with any element in 46 CFR 139.120, the application will be denied. To ensure the information provided is complete, a "[TPO Application Check Sheet](#)" can be found on the TVNCOE website. The check sheet also provides clarification on what is needed to demonstrate compliance with each element in 46 CFR 139.120, and is used by the TVNCOE during the review process.

## Ask questions:

Submitting a TPO approval application is not intended to be difficult or burdensome; however, to obtain approval, an organization must demonstrate compliance with minimum regulatory requirements. Submission of an incomplete or disjointed application will delay the approval process. If you have questions about approval requirements or the process to be approved, the TVNCOE is standing by to assist you.

Upon receipt of your application, you will be notified that the TVNCOE has received the same, and a staff member will be assigned to review the application. All questions should be directed to the assigned TVNCOE staff member.

### TVNCOE Staff

CDR Andrew Bender  
(270) 444-7715 x201  
Andrew.R.Bender@uscg.mil

LCDR Charles Mellor  
(270) 444-7715 x202  
Charles.A.Mellor@uscg.mil

CWO4 Mark Belt  
(270) 444-7715 x207  
Harold.M.Belt@uscg.mil

Mr. Michael Kelly  
(270) 444-7715 x206  
Michael.J.Kelly@uscg.mil

Mr. Steven Douglass  
(270) 444-7715 x205  
Steven.T.Douglass@uscg.mil

Mr. Dave Phillips  
(270) 444-7715 x204  
Dave.W.Phillips@uscg.mil

Detachment Chief  
U.S. Coast Guard  
Towing Vessel National Center of Expertise  
504 Broadway Street, Suite 101  
Paducah, KY 42001

Main: (270) 444-7715

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[www.dco.uscg.mil/tvncoe](http://www.dco.uscg.mil/tvncoe)

Coast Guard's experts on  
commercial towing

## Towing Vessel National Center of Expertise (TVNCOE)



Tips for Submitting  
Third-Party  
Organization (TPO)  
Applications for  
Approval

46 CFR Subchapter M—Inspection of Towing Vessels authorizes approval of a TPO to perform towing vessel audits and surveys. A TPO seeking Coast Guard approval must submit an application to the Coast Guard TVNCOE.

In accordance with 46 CFR 139.115(b), the TVNCOE will have to determine the TPO's program:

- Is independent of the owner or managing operator and vessels that it audits or surveys
- Operates within a quality management system acceptable to the Coast Guard
- Ensures its auditors and surveyors are qualified and maintain continued competence
- Demonstrates the ability to carry out the responsibilities of approval
- Meets all requirements of 46 CFR Part 139

Upon receipt of an application package, a TVNCOE staff member will be assigned to conduct an in-depth review. The information provided is key to the review process as it is the basis for determining if the TPO meets the minimum standards for approval. Failure to provide relevant and adequate information will result in the denial of the request for

approval as a TPO. The minimum requirements to be approved as a TPO can be found in 46 CFR 139.120. To expedite the review process, the following are suggestions for developing a successful TPO application:

**State the purpose of the application:**

46 CFR 136.115(a) lists the functions an approved TPO can perform:

- Conduct Towing Safety Management System (TSMS) audits
- Issue TSMS certificates
- Conduct towing vessel surveys
- Issue survey reports

A TPO can be approved to conduct one, two, three, or all four functions. The application must clearly state which functions the TPO would like to be approved to conduct.

**Organize the information:**

46 CFR 139.120 (a)-(q) lists the information that will need to be reviewed and evaluated by the TVNCOE. To facilitate the review process, applications should be organized into sections “a” through “q” so the information provided aligns with the required approval elements listed in 139.120. Each section should contain the information that demonstrates the TPO

meets the corresponding element in 46 CFR 139.120. For example, section “a” of the application package would contain the information that provides a description of the organization, section “b” would contain the information that provides a general description of the clients being served or intended to be served, etc. Organizing the application in this manner will minimize confusion regarding the information that is being offered to demonstrate your organization meets each regulatory element for approval.

**Submit concise and clear information:**

The information submitted should be tailored so it supports each element in 46 CFR 139.120. Providing extraneous information could lead to confusion about what is being provided to support an element, or may result in complications during future TPO oversight activities. In addition, assumptions are not made during the review process; the information provided for consideration must clearly demonstrate compliance with each element. An approved TPO will be expected to demonstrate compliance with all processes and procedures contained in an approved application package.