

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 to the TVNCOE 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 the approval your 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 TPO approval requirements or the process to be approved as a TPO, 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 your application. All questions should be directed to the assigned TVNCOE staff member.

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CG's experts on
commercial towing

Towing Vessel National Center of Expertise



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

46 CFR Subchapter M—Inspection of Towing Vessels authorizes approval of a Third-Party Organization (TPO) desiring to perform audits and surveys. A TPO seeking approval by the Coast Guard must submit an application for approval to the Coast Guard’s Towing Vessel National Center of Expertise (TVNCOE).

In accordance with 46 CFR 139.115(b), in order for the TVNCOE to approve a perspective TPO, the TVNCOE will have to determine that the organization’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 a TPO application package, a TVNCOE staff member will be assigned to conduct an in-depth review of the application. The information provided is key to the review process as it is the

basis for determining if the perspective TPO meets the minimum standards to be approved. 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 — Towing Safety Management System (TSMS) audits, issue TSMS certificates, conduct towing vessel surveys and/or 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 perspective 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 organization 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 your application in this manner will minimize any confusion regarding the information that is being offered to demonstrate your organization meets each regulatory element for approval.

Submit concise and clear information:

Information submitted by a perspective TPO 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 provided information must clearly demonstrate compliance with an element. An approved TPO will be expected to demonstrate compliance with all processes and procedures contained in the approved application package.