

R 121639Z JUNE 09
FM COMDT COGARD WASHINGTON DC//CG-54//
TO COMLANTAREA COGARD PORTSMOUTH VA//A//
COMPACAREA COGARD ALAMEDA CA//P//
INFO COMDT COGARD WASHINGTON DC//CG-1/CG-5/CG-6/CG-7/CG-543//
BT

UNCLAS //N16710//

SUBJ: COAST GUARD TOWING VESSEL BRIDGING PROGRAM (TVBP)

A. LANTAREAINST 16710.1, COMMERCIAL UNINSPECTED TOWING VESSEL EXAMINATION PROGRAM

B. TOWING VESSEL BRIDGING PROGRAM POLICY MEMO, DATED 12JUN09.

1. A SIGNIFICANT REGULATORY PROJECT IS UNDERWAY THAT WILL SUBJECT THE MAJORITY OF COMMERCIAL TOWING VESSELS (5,200+) TO INSPECTIONS FOR CERTIFICATION. IN THE PERIOD BETWEEN THE CURRENT AND FUTURE STATE OF TOWING VESSEL SAFETY OVERSIGHT, WE NEED TO EASE THE TRANSITION TO ENSURE THAT THE COAST GUARD AND THE TOWING VESSEL INDUSTRY ARE INFORMED AND PREPARED TO MEET THE NEW REQUIREMENTS TO BE FINALIZED IN SUBCHAPTER M. THIS GOAL WILL BE ACCOMPLISHED BY CARRYING OUT A ROBUST TOWING VESSEL BRIDGING PROGRAM (TVBP) THAT ENHANCES AND INCREASES COAST GUARD INTERACTIONS WITH THE TOWING INDUSTRY AND ACCLIMATES ALL INVOLVED WITH THE PROCEDURES, POLICY, REQUIREMENTS OF EXISTING AND, WHEN APPROPRIATE, NEW SUBCHAPTER M REGULATIONS. THE TVBP WILL INVOLVE EXTENSIVE INDUSTRY OUTREACH, QUALIFICATION OF CG MEMBERS TO A NATIONAL STANDARD, AND EXAMINATION OF EVERY UNINSPECTED TOWING VESSEL (UTV) THAT WILL BE INSPECTED UNDER SUBCHAPTER M.

2. ELEMENTS OF THE PROGRAM: CG OFFICE OF VESSEL ACTIVITIES, DOMESTIC COMPLIANCE DIVISION (CG-5431), IN CONSULTATION WITH REPRESENTATIVES OF THE TOWING INDUSTRY AND CG LANTAREA AND PACAREA, HAS DEVELOPED THE FRAMEWORK FOR THE TVBP THAT IS COMPRISED OF THREE (03) PHASES WITH FIVE (05) CRITICAL ELEMENTS (OUTLINED BELOW).

2.A. PHASE 1, COMMENCING DURING THE SUMMER OF 2009 WITH AN ANTICIPATED DURATION OF UP TO 18 MONTHS, WILL BE SCALED BASED ON PROGRESS IN MEETING INDUSTRY'S DEMAND FOR EXAMS.

2.A.1. OUTREACH. ALL LEVELS OF COMMAND ARE EXPECTED TO CONDUCT EXTENSIVE OUTREACH WITH INDUSTRY, DISCUSSING THE TVBP, STRONGLY ENCOURAGING PARTICIPATION IN THE INDUSTRY INITIATED EXAMS (DESCRIBED IN 2.A.3), AND, AFTER PUBLICATION OF THE SUBCHAPTER M NOTICE OF PROPOSED RULEMAKING, COMMUNICATING DETAILS OF THE PROPOSED REGULATIONS AND ENCOURAGING COMMENT.

2.A.2. EDUCATION AND QUALIFICATION. PERSONNEL THAT WILL BE CONDUCTING TOWING VESSEL EXAMS WILL BE REQUIRED TO COMPLETE A TOWING VESSEL EXAM INDOCTRINATION AND QUALIFICATION PROCESS, WHICH IS CURRENTLY BEING DEVELOPED BY JOINT INDUSTRY/CG WORK GROUPS. THE PQS AND ASSOCIATED INDUSTRY INDOCTRINATION PACKAGE WILL BE DISTRIBUTED TO THE FIELD IN JUNE 2009 AS DISCUSSED IN PARAGRAPH 4.

2.A.3. INDUSTRY INITIATED EXAMS. THE EXAM PROGRAM PROMULGATED BY LANTAREA, REF (A), WILL BE EXPANDED AND IMPLEMENTED CG-WIDE. TWO KEY FEATURES OF THE INDUSTRY INITIATED EXAM INITIATIVE ARE: (1)

INDUSTRY INITIATES A REQUEST TO A LOCAL COTP/OCMI TO SCHEDULE A TOWING VESSEL EXAM; AND (2) A CG DECAL IS ISSUED TO THOSE VESSELS DEEMED TO BE IN COMPLIANCE WITH EXISTING REGULATIONS.

2.B. PHASE 2 WILL COMMENCE AFTER THE INDUSTRY HAS BEEN GIVEN THE OPPORTUNITY TO PARTICIPATE IN AND THE CG HAS SATISFACTORILY CONDUCTED REQUESTED INDUSTRY INITIATED EXAMS, AND CONTINUES UNTIL SUBCHAPTER M IMPLEMENTATION (PHASE 3).

2.B.1. RISK-BASED TARGETED EXAMS. SECTORS AND SUBORDINATE MSU'S AND MSD'S WILL IMPLEMENT A RISK-BASED TARGETING TOOL (TBD BY THE TVNCOE), CONCEPTUALLY SIMILAR TO THE METHODOLOGY USED FOR PORT STATE CONTROL EXAMS, WHICH FOCUSES ON VESSELS THAT DO NOT HAVE A VALID DECAL. THE COTP/OCMI WILL DETERMINE THE PRIORITY OF EXAMS BASED ON RISK FOR THOSE VESSELS THAT OPERATE IN HIS/HER AOR.

2.C. LE BOARDINGS AND SURGE OPERATIONS. THROUGHOUT PHASES 1 AND 2, OPERATIONAL COMMANDERS WILL HAVE WIDE DISCRETION TO PLAN AND EXECUTE LE BOARDINGS AND SURGE OPS AS RESOURCES PERMIT; THE LEVEL OF PARTICIPATION IN THE INDUSTRY INITIATED EXAM INITIATIVE SHOULD SERVE AS A FACTOR FOR DETERMINING THE FOCUS AND TEMPO OF UNDERWAY BOARDINGS.

3. CG PERSONNEL AND PROGRAM EXECUTION. COTPS/OCMIS WILL HAVE THE FLEXIBILITY TO EMPLOY PERSONNEL ASSIGNED TO TOWING VESSEL INSPECTION BILLETS OR OTHERS THAT THEY JUDGE QUALIFIED TO ACCOMPLISH THIS MISSION. HOWEVER, AT A MINIMUM, THE NEW TOWING VESSEL INSPECTOR BILLETS ASSIGNED SHALL BE EMPLOYED IN CONDUCTING TOWING VESSEL TRAINING, OUTREACH, AND EXAMINATIONS.

4. EXAMS. THE EXPECTATION IS THAT INDUSTRY INITIATED EXAMS WILL COMMENCE DURING THE SUMMER OF 2009; HOWEVER, THIS DOES NOT PRECLUDE UNITS ALREADY CONDUCTING UTV EXAMS IN ACCORDANCE WITH REF (A) FROM CONTINUING THEIR ACTIVITIES. ALL UTVS THAT WILL BE INSPECTED UNDER SUBCHAPTER M SHOULD AT LEAST UNDERGO ONE (01) EXAM (INDUSTRY INITIATED OR RISK-BASED TARGETED) BY AUG 2012.

5. COMMUNICATIONS. TRANSPARENCY WILL BE A HALLMARK OF THIS PROGRAM. MORE DETAILS OF THE PROGRAM ARE DESCRIBED IN REF (B) (ATTACHED TO THIS MSG). CG-5431 WILL COMMUNICATE TVBP STATUS UPDATES VIA MESSAGE AND WILL POST RELEVANT TVBP DOCUMENTS FOR INTERNAL CG USE ON CG PORTAL AT CG COLLABORATION-PUBLIC PLACES-DOMESTIC VESSEL INSPECTIONS-POLICY-[TOWING VESSELS](#). PUBLIC DOCUMENTS WILL BE POSTED ON CG HOMEPORT AT [HTTP://HOMEPORT.USCG.MIL-DOMESTIC VESSELES-TOWING VESSELES](http://homeport.uscg.mil-domestic-vesseles-towing-vesseles).

6. AS THE TOWING VESSEL NATIONAL CENTER OF EXPERTISE (TVNCOE) STANDS UP IN PADUCAH, KENTUCKY, CG-5431 WILL HELP TRANSITION ELEMENTS OF THE TVBP TO APPROPRIATE OFFICES FOR FURTHER DEVELOPMENT AND MAINTENANCE. ONCE ESTABLISHED, THE TVNCOE WILL PLAY A CRITICAL ROLE IN ALL ASPECTS OF THE BRIDGING PROGRAM, INCLUDING SERVING AS THE KEY REFERENCE AND POINT OF CONTACT FOR TOWING VESSEL SAFETY, SECURITY, AND ENVIRONMENTAL PROTECTION ISSUES. THE TVNCOE WILL ALSO PLAY A CENTRAL ROLE IN TOWING VESSEL EXAMINATION TRAINING, AND IN MONITORING THE PROGRESS OF THE TVBP, RECOMMENDING ANY NECESSARY COURSE CORRECTIONS TO CG-5431. IN THE INTERIM, CG-5431 WILL MANAGE THE PROGRAM, AND ENSURE ALL ORGANIZATIONAL ELEMENTS ARE ENGAGED AND REPRESENTED.

7. THE POINT OF CONTACT FOR THE TOWING VESSEL BRIDGING PROGRAM IS CDR GREGORY HOWARD UNTIL 01JUL09. HE MAY BE REACHED AT [GREGORY.A.HOWARD\(AT\)USCG.MIL](mailto:GREGORY.A.HOWARD(AT)USCG.MIL) OR AT (502) 552-3369. AFTER 1JUL09, CONTACT MR. PATRICK LEE AT [PATRICK.J.LEE\(AT\)USCG.MIL](mailto:PATRICK.J.LEE(AT)USCG.MIL) OR AT (202) 372-1135.

8. RDML JAMES WATSON, DIRECTOR OF PREVENTION POLICY, SENDS.

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