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16714  
Policy Ltr 1-01  
4 Apr 01

From: Commander, Seventh Coast Guard District  
To: Distribution

Subj: REQUIRED NAVIGATION SAFETY EQUIPMENT TESTING UNDER 33 CFR  
164.25 FOR CRUISE SHIPS OPERATING IN SEVENTH DISTRICT WATERS

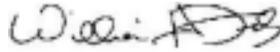
Ref: (a) Title 33, Code of Federal Regulations, Part 164.25  
(b) International Convention on the Safety of Life at Sea (SOLAS), 1974, Amended

1. Reference (a) requires all vessels to conduct tests of specific navigation and emergency equipment 12 hours prior to both arrival into or getting underway upon the navigable waters of the United States. Reference (b) contains a similar requirement in SOLAS Chapter V/Regulation 19-2 for testing of the steering system of vessels 12 hours prior to getting underway on international voyages.
2. Most cruise ships operating in Seventh District/Caribbean waters have multiple port visits within a very short time frame. In many cases, the transit time between port calls is less than 24 hours. For those vessels operating with port calls in Puerto Rico, the U.S. Virgin Islands, and the Florida Keys, these multiple U.S. port calls require multiple tests of the navigation equipment, sometimes as many as 4 or 5 tests within a 36 to 48 hour period. This testing frequency, especially for emergency generators and batteries under no/extremely light loads, may be excessive and may create an increased potential for damaging critical emergency equipment.
3. Based upon a review of reference (a), Seventh District Officers in Charge, Marine Inspection are authorized to waive the 12-hour requirements in reference (a) and institute amended timelines for testing as outlined below. Waivers may be granted for those cruise ships operating in Seventh District waters on short duration cruises (4 days or less) or those vessels on 7 day or less voyages with multiple U.S. port calls (e.g. depart Miami with port calls in San Juan and the USVI). These amended timelines do not change any requirements contained in SOLAS.
4. Testing intervals may be waived or decreased as follows (33 CFR 164.25):
  - a. Primary and secondary steering gear - tested in accordance with 33 CFR 164.25(a)(1)(iv) and (vii) prior to departure and in the vicinity of the sea buoy prior to entering port; all other requirements in 33 CFR 164.25(a)(1) shall be completed weekly during the test outlined in paragraph 4.c below;
  - b. Internal vessel control communications and vessel control alarms - tested weekly;
  - c. Standby or emergency generator - tested weekly under load;
  - d. Storage batteries for emergency lighting and power systems - tested weekly; and
  - e. Main propulsion machinery ahead and astern - prior to departure and in the vicinity of the sea buoy prior to arrival.

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5. Waivers may not be granted for systems using new technology (e.g. azipod systems) may not be granted waivers for steering or propulsion tests until those systems have developed a satisfactory operating history.



WILLIAM H. FELS  
By direction

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