



CGD SEVEN (m)
Policy Ltr 8-97
15 October 1997

From: Commander, Seventh Coast Guard District
To: Distribution

Subj: DRYDOCK EXTENSIONS FOR SMALL PASSENGER VESSELS ON
INTERNATIONAL VOYAGES

Ref: (a) SOLAS, ch. 1, Regulation 7
(b) Marine Safety Manual Vol II

1. This policy is promulgated to ease an obvious inequity for U.S. small passenger vessels subject to SOLAS and operating on international voyages. The application of drydocking requirements under 46 CFR 176.600(b), for these small passenger vessels is in excess of the requirements for all other "T-boats" as well as for foreign SOLAS vessels competing on the same routes. At issue is the fact that U.S. "T-boats" must undergo annual drydocking examinations, while foreign flagged passenger vessels complying with SOLAS need only conduct annual underwater examinations of the bottom.

2. Reference (a) requires annual periodic surveys which include inspection of "the outside of the ship's bottom" to ensure that the ship's structure "is in satisfactory condition and fit for the service intended." Under this regulation, underwater surveys of the hull are being accepted by other flag administrations in lieu of actually hauling the vessel out of the water. Under 46 CFR 176.600(b), as recently amended by the Federal Register dated 30 September 1997, annual drydocking of "T-boats" subject to SOLAS on international routes is required. The salt water drydocking schedule for non-SOLAS "T-boats" is every two years. Drydock examinations required under 46 CFR 176.600 "must be conducted while the vessel is hauled out of the water or placed in a drydock or slipway." However, under 46 CFR 176.670, the Officer-in-Charge Marine Inspection (OCMI) or Commandant may extend these required drydock intervals. Section 8.A.4.d(6) of reference (b) gives the OCMI authority to extend these intervals for up to one year.

3. Based upon the above discussion, alternate underwater examinations in lieu of the annual drydock; coupled with the biennial drydocking survey can be used for SOLAS "T-boats" without compromising regulatory or treaty requirements.

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4. Seventh District OCMIs who have "T-boats" subject to SOLAS, operating on international routes are encouraged to grant one year drydock extensions for these vessels. Each of these extensions shall be evaluated on a case by case basis and shall be based upon a pre-extension survey, as well as the other requirements of Section 8.A.4.b. of reference (b). Each pre-extension survey shall, at a minimum, include an underwater examination of the hull. This should bring the drydock examination schedule for the SOLAS international "T-boat" fleet in line with that of their competition.

5. Should you have any questions please contact CDR Carter of my staff. I plan to petition Commandant (G-MOC) to accept this as Coast Guard wide policy.


R. C. WIGGER
By direction

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