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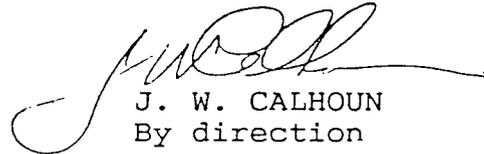
MAY 13 1995

From: Commander, Eighth Coast Guard District  
To: Distribution

Subj: NAVIGATION LIGHTS

1. The District has received a complaint about the use of battery operated non-approved navigation lights on barges. The adequacy of barge navigation lights is a problem that may have contributed to several marine casualties and requires our constant vigilance.

2. Enclosure (1) was developed by MSO New Orleans and offers excellent inspection guidance on this subject. Use of the enclosure in conjunction with G-MTH-2's Navigation Light Acceptance List will ensure compliance with the Rules of the Road as modified by COMDTINST 16672.3A dated 10 May 1989.

  
J. W. CALHOUN  
By direction

Encl: (1) MSO New Orleans CIDIG MEMO #13 dated 01 JUN 90

Dist: All Eighth District MSOs and MSDs

Subject: GUIDANCE FOR INSPECTION OF NAVIGATION LIGHTS

Cancellation: CIDIG MEMO #13 dated 13 March 1989

Reference: (a) 33 CFR 81.9  
(b) COMDTINST M16672.2A NAVIGATION RULES  
(c) U.L. Standard 1104  
(d) U.L. Marine Products Directory, August 1989 Edition

1. Purpose: This memo is intended to be used as a guide for the inspection of navigation lights onboard inspected vessels.

2. Background:

a. Prior to the effective date of the 72 COLREGS, (15 July 1977), a number of navigation light fixtures, including the screw-down based "Edison" fixtures were considered acceptable for use onboard inspected vessels. Today, the "Edison" based fixtures are still around, however, the authorized bulbs that were originally manufactured for this fixture are no longer available. Consequently, many vessel operators are installing household bulbs in these fixtures. Additionally, navigation light fixtures have been modified to accommodate household type bulbs, as well as other non-approved bulbs. These bulbs are not approved for use in navigation light fixtures as they do not meet the intensity requirements necessary for the required ranges (i.e., 1 mile, 3 miles, etc.).

b. An approved fixture, under the 72 COLREGS, is a pressure-mounted type with a base similar to the bayonet base. The bulbs designed for this fixture have a vertical filament that, when installed in the fixture, will be in line with the focal point of the navigation light lens. These bulbs are referred to in reference (c) as "pre-focused lamps".

c. Additionally, the 72 COLREGS provided for alternative compliance to the light, shape, and sound signal requirements. The intent of this was to allow owners of vessels especially constructed or used for special purposes to deviate from the 72 COLREGS. An Offshore Supply Vessel (OSV) that operates in the mineral and oil industry is an example of a vessel that fits this description in that they are used for a specific function and their arrangement is relatively inflexible. Specifically, the OSV design makes compliance with the light separation of masthead lights impracticable.

d. Annex I, of the 72 COLREGS states that when two masthead lights are prescribed, the horizontal distance between them shall not be less than one half of the length of the vessel. In applying this to the typical OSV, you would find the after masthead light in the middle of the cargo deck where it would interfere with the operation of the vessel.

e. The owner of a vessel may apply in writing to a Commandant for a determination that alternative compliance is justified. If so, a Certificate of Alternative Compliance shall be issued to the vessel. Some early certificates were issued to the Commandant. This would allow the masthead lights to be in closest compliance with the 72 COLREGS without interfering with the special function of the vessel.

f. The Certificate of Alternative Compliance remains in effect so long as the vessel continues to be engaged in the operation for which the certificate was issued. The owner or operator of the vessel shall ensure that the certificate, or a certified copy of the certificate, is onboard the vessel and available for inspection in accordance with 33 CFR 89.18(b) and/or 81.18(b).

g. Rule 38 of the 72 COLREGS contains certain exemptions for vessels that: (a) comply with the requirements of the International Regulations for Preventing Collisions at Sea, 1960, (b) the keel of which is laid prior to 15 July 1977. The exemptions range from four years to permanent depending on the type of vessel and the type of requirement. This does not preclude the requirement to obtain a Certificate of Alternative Compliance.

3. Action:

a. During an inspection, if the positioning of the navigation lights appears not to conform to the 72 COLREGS, the inspector should check to see if a Certificate of Alternative Compliance has been issued to the vessel (see enclosure 1). If the vessel does not have such a certificate and the lighting fact not in compliance with the technical positioning rule 835 should be issued to correct the situation.

b. With regards to the navigation light bulbs, vessels 20 meters (65.6 FT) in length or greater constructed on or after 15 July 1977, are required to have navigation light fixtures that meet U.L. Standard 1104. Compliance is indicated by the Classification marking as shown in enclosure (2). In addition, enclosure (2) is a listing of approved manufacturers and models. Only the bulbs listed on the fixture label may be used as replacements.

c. Vessels less than 20 meters (65.6 FT) in length constructed on or after 15 July 1977, are required to have navigation lights that meet either U.L. Standard 1104 or Boat and Yacht Council, Incorporated (ABYC) Standard A-16. Compliance is indicated by either the marking "A-16" or the marking as shown in enclosure (2) located on the fixture label.

d. Existing installations on vessels constructed prior to 15 July 1977 which appear to meet the sector and the range visibility requirements (i.e., use vertical filament, Edison bulbs), are presumed to be in compliance. However, if so-called "Edison" based fixtures are found during an inspection and

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household bulbs are installed, a basis exists to write an 835 requiring replacement of the fixture with an approved fixture. Replacement bulbs must be of a type approved by the manufacturer for that particular type of fixture.

e. Plastic navigation light lenses deteriorate over time. Lenses of any color which demonstrate significant opacity must be replaced.

f. CG-835s issued for correction of navigation light deficiencies should require that the deficiency "be corrected prior to any operation of the vessel during the period from sunset to sunrise or periods of restricted visibility".

Encl: (1) Copy of Certificate of Alternative Compliance  
(2) 1989 U.L. Marine Products Directory, p. 69