

U.S. Department
of Transportation
United States
Coast Guard



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From: Commander, Eighth Coast Guard District
To: Distribution

Subj: STANDARDIZATION OF EVALUATION AND CREDITING OF SEA SERVICE FOR
GAMING VESSELS

1. Effective immediately, all Eighth District Regional Exam Centers (RECs) shall utilize the procedures in Enclosure (1) for crediting sea service on gaming vessels. For the purposes of this policy, underway is defined as being away from a shoreside dock.
2. Enclosure (2) contains the data which must be included on sea service letters from companies that request credit for days when vessels sailed less than 4 hours.
3. Questions regarding this matter may be referred to CDR Schafersman at (314) 539-3900.


GUY A. TETREAU
By direction

Encl: (1) D8 Sea service credit policy
(2) Required data for standard sea service letter

Dist: All Eighth District RECs
REC Coordinator
DWRO

EIGHTH DISTRICT SEA SERVICE CREDIT POLICY

The Coast Guard recognizes the wide diversity of gaming vessel operations throughout the United States. Differences in tonnage, physical size, operating schedules, manning levels and route make many vessels unique and prevent them from conforming to traditional vessel operating profiles. This policy was developed to standardize Coast Guard actions relative to the acceptance of sea service towards issuance, renewal, and upgrade of Merchant Mariner Documents (MMDs) and licenses on Eighth District gaming vessels.

1. **VESSELS THAT DO NOT GET UNDERWAY**: Dockside service by deck and engineering crewmembers on vessels that are actually in operation and whose service is mandated by the vessel's COI but do not get underway, will be credited as follows:

a. **RENEWAL**: Service is creditable as "closely related service" for renewal of licenses and MMDs. Mariners who demonstrate three years service, in any capacity, during the past five years will be eligible for renewal. However, deck officers will be required to complete the Rules of the Road open-book examination.

b. **RAISE IN GRADE**: Service may be creditable for upgrade if it is similar in nature to the duties performed aboard an in-service vessel while such vessel is in port. Such service is creditable for a maximum of 180 days of the service required for an upgrade at the rate of three days of service equals one day of credit. This service may not be credited toward recency.

c. **ORIGINAL LICENSE**: Service may be credited for an original license or MMD. Such service is creditable for up to 30 days of the required service, day for day, when earned in conjunction with a company training program approved by the National Maritime Center (NMC) or by any other entity or organization approved by Commandant or the NMC for this purpose, such as third parties employing a Quality Standard System (QSS) in accordance with NVIC 7-97.

2. **GAMING VESSELS THAT GET UNDERWAY FOR LIMITED PERIODS**: On any day that a vessel gets underway, service may be credited for renewals, upgrades, recency and original licenses as follows:

a. For vessels that do extensive, multiple cruising (four or more hours out of every eight hours of service), full credit may be granted. This recognizes the preparation time for getting underway, the time necessary for securing the vessel after and crew duties associated with vessel turnaround.

b. For vessels that cruise two or more hours in an 8 hour period, service is creditable at a rate of two days sea service for one day of credit, providing the vessel was underway for at least 2 hours in any 8 hour period.

c. For vessels that are underway for less than 2 hours in any 8 hour period, sea service is creditable at the rate of three days sea service for one day of credit.

d. In lieu of calculating daily underway time, the mariner may calculate his or her total underway time for a given period (week, month, etc.) and divide by the number of days to obtain the average daily underway time (ADUT). The ADUT can then be converted to days of sea service using the guidelines above. RECs may accept whichever method provides the greatest credit to the mariner.

3. ACCEPTANCE OF TIME-AND-ONE-HALF SERVICE

a. The word "day" is defined in 46 CFR 10.103. It recognized regular watchstanding and day-working as acceptable service. It does not recognize overtime. If the mariner can establish that he or she works a 12 hour day on a vessel in a "crew" position, and that such a work schedule is legal, time-and-one half credit should be given. It is the responsibility of the mariner to provide adequate documentation to prove the 12 hour day consisted of shipboard duties relative to vessel operation and maintenance. Work hours for some vessels are specified in 46 USC 8104.

b. These twelve hour workdays will normally consist of watchstanding but can consist of day-work directly involved with the operation and maintenance of the vessel when operating under the authority of the Certificate of Inspection. The vessel may be underway, at anchor or at the dock (e.g., while making preparations for getting underway) when this work is performed.

c. If a mariner establishes bona fide 12 hour service, compute the total sea service to be credited by using the guides in Paragraphs 1 and 2 above then increase that sea service by 50% to determine the total number of days for final credit. If the mariner presents mixed 8 hour and 12 hour service, compute the credit for each separately and then add the two together for the total service credit.

4. VESSEL AND COMPANY SPECIFIC LICENSES

a. Vessel or company-specific licenses are discouraged. They can cause confusion for the mariner, industry and evaluators. However, the career path for a mariner within a specific company should be recognized. OCMI's may issue a vessel or company specific license when it is apparent it is the only method of ensuring adequate manning levels and/or promotion paths within a company. Generally, these licenses should be the result of a partnering effort with the specific company, and is part of a comprehensive review of the company's operation, personnel needs and promotional opportunities within the manning structure of the company's vessels. Licenses issued under this policy shall be endorsed as; "Raise in Grade or lifting of the restrictions upon this license are subject to the approval of the issuing Regional Exam Center."

ELEMENTS OF A STANDARD SEA SERVICE LETTER

1. The Regional Exam Centers will standardize what is required to appear in a sea service letter for gaming vessels. This data will enable the evaluators to accurately determine qualifying sea service. At a minimum, the following data should be included on sea service letters signed by the appropriate company officials or licensed masters:

- a. Name and SSN of applicant.
- b. Vessel particulars.
 - 1) Name of vessel.
 - 2) Official number.
 - 3) Gross tons as per vessel's certificate of documentation
Note: NOT ITC GROSS TONS.
 - 4) Horsepower as per vessel's certificate of documentation.
 - 5) Length overall.
- c. Position served/worked as required by COI or regulation.
- d. Waters/route operated on.
- e. Type of watch schedule (6 on, 6 off or 12 on, 12 off) and must specify whether or not it is a continuous watch rotation with off-duty watchstanders/workers remaining on the vessel.
- f. Description of duties.
- g. Name and License number (if applicable) of person attesting to the sea service.
- h. Understanding of 18 USC 1001.
- i. Dates worked.
- j. Number of days underway for at least 4 hours.
- k. Number of days underway for 2 or more hours. (Do not include days counted in (j) above).
- l. Number of days underway for less than 2 hours. (Do not include days counted in (j) or (k) above).
- m. Number of days not underway. This includes all days that the vessel is not underway from a shoreside dock.
- n. In lieu of (j) through (m) above, the mariner may provide:

total days underway _____
total hours underway _____

Note: Regardless of which of the above methods is used to document sea service, the hours and/or days underway or not underway must be broken down for each vessel and each position served.

2. It is also recommended that each company submit a list, with actual signatures, of those authorized by the company to sign sea service letters.