

Frequently Asked Questions

TABLE OF CONTENTS FOR THIS SECTION:

1. Existing Licenses for Towing Vessels.....	1
a. Will my existing license be valid on towing vessels after May 20, 2001?	1
Figure: Eligibility for Towing Licenses.....	2
b. Will you grandfather my current license or authority for towing vessels?	2
c. How do I renew my OUTV License?.....	3
d. What is a TOAR?.....	4
e. What licenses will you grandfather?	4
f. If I do not already hold a license as OUTV, but am a master, mate, etc.	5
g. How can I document my towing experience?.....	6
h. What if I am already training for a towing-vessel license?.....	6
i. What if I already hold an Oceans endorsement?	6
2. New Licenses for Towing Vessels	6
a. What if I already hold a license?.....	7
b. What are the specific licensing requirements for towing vessels?.....	7
c. What license do I need to operate towing vessels?	7
d. How old must I be to hold a towing license?.....	8
e. What is the training procedure for obtaining a towing-vessel license?.....	9
Figure: License Progression.....	9
f. What is a TOAR?	10
g. How do I document proficiency?.....	10
h. How much of the TOAR must a candidate complete?.....	12
i. How do I obtain a license for towing vessels if I don't have towing experience?.....	13
j. How do I obtain an Oceans endorsement?.....	13
3. Towing-Vessel Licensing in General	14
a. What will I need to renew my license as master of towing vessels?.....	14
b. How do I qualify as a designated examiner?	15
c. What is the difference between "mate" and "pilot" of towing vessels?.....	15
d. What issues of recency does this rule add?.....	15
e. What new examinations are required?	16
f. What route examinations are required?	16
Figure: Example for Exam Requirement for Route Extension	16
g. Are there tonnage restrictions on the towing vessel license?.....	16
h. What is a Limited Local Area Route?.....	16
i. Can I move from towing vessels to other types of vessels?.....	18
j. Were there changes to the pilotage rules?.....	18
k. Can my assistance-towing experience count toward a towing license?.....	18
4. Manning.....	18
a. What is the manning required for towing vessels after May 21, 2006?	18
b. What is the manning required for towing vessels between May 20, 2001, and May 21, 2006?	18
5. STCW	19
a. Who must comply with STCW on towing vessels?.....	19
b. What level of compliance is necessary for officers on seagoing towing vessels?	19

1. Existing Licenses for Towing Vessels. This part applies to any licensed mariner operating towing vessels before May 21, 2001.
 - a. Is my existing license valid on towing vessels after May 20, 2001?
 - (1) Yes, your license is valid as currently issued until its first renewal on or after May 21, 2001.
 - (2) We will “grandfather” your authority for most licenses, where you prove towing service.
 - (3) See the following chart, from 46 CFR 10.210, to determine whether you will be eligible for a license for service on towing vessels at your next renewal.

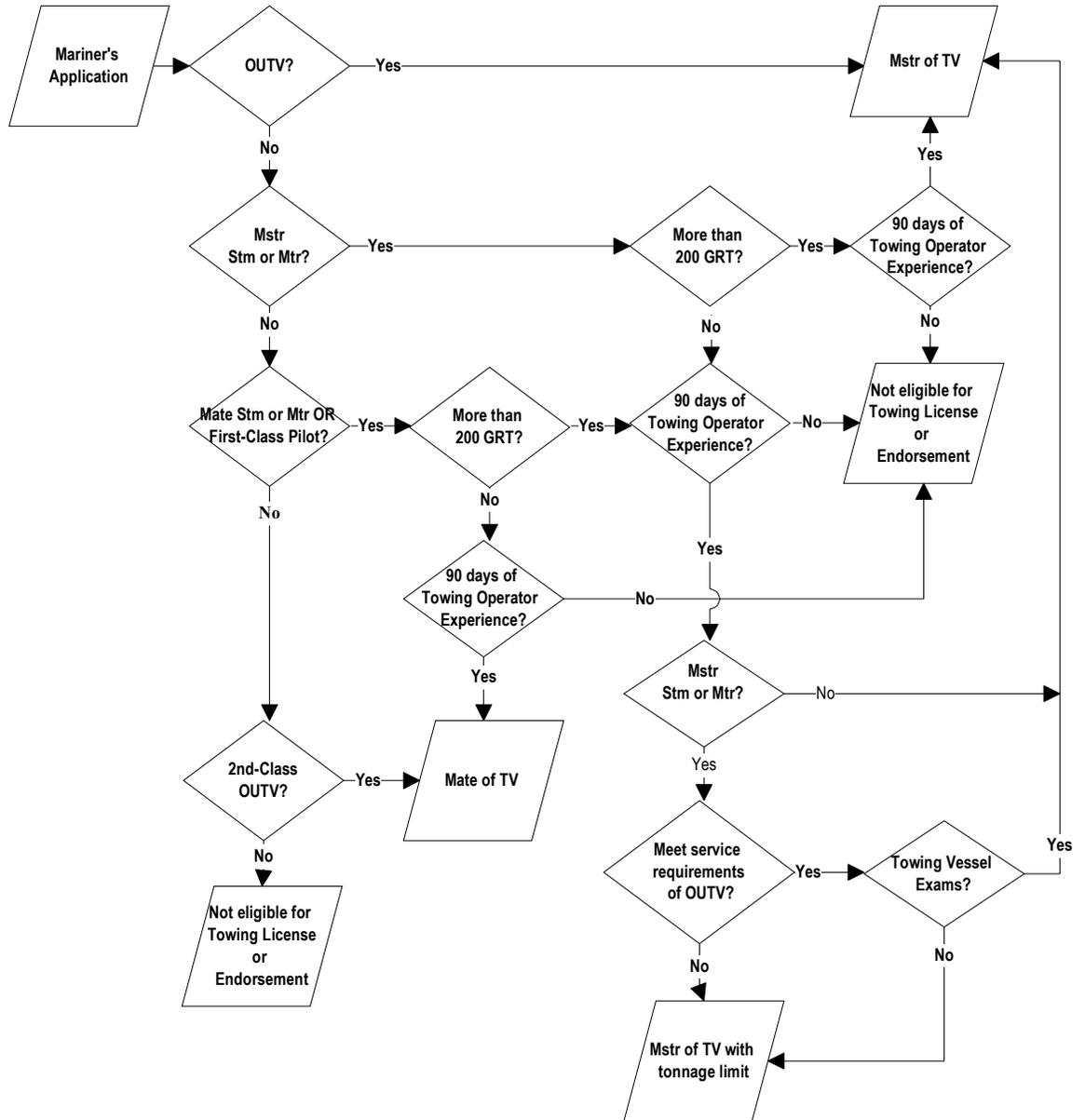


Figure10.210 ELIGIBILITY FOR TOWING LICENSES

- b. Will you grandfather my current license or authority for towing vessels?
 - (1) Yes, at your next regular renewal or upgrade on or after May 21, 2001; if –

- (a) you hold a license as OUTV, we will issue you a license as master of towing vessels; or
 - (b) you hold a license as 2nd-Class OUTV, we will issue you a license as mate (pilot) of towing vessels; or
 - (c) you are operating towing vessels under equivalency through 46 CFR 15.910, in effect before May 21, 2001, and you provide written evidence of 90 days of service operating towing vessels, we will issue you a license as master of towing vessels.
- (2) A master of inspected self-propelled vessels endorsed for not more than 200 GRT is limited to the tonnage restriction on the face of the license. If the mariner has more than 24 months of towing-vessel experience and passes the OUTV exams, the license as master of towing vessels will be issued without tonnage limitation.
- (3) We will endorse your new license with each route that you have on your current license. If your license bears an endorsement for Oceans, the new license will bear one for Oceans and Western Rivers and will authorize service on all waters considered subordinate to Oceans (Near-Coastal and Great Lakes – inland.)
- (4) Master of towing vessels endorsed for Oceans or Near-Coastal waters is limited to vessels of not more than 200 GRT.
- (5) You are not eligible for a towing vessel endorsement if –
- (a) you are eligible under a previous equivalency but do not have 90 days of towing experience under the authority of your license before the first renewal or upgrade of your license on or after May 21, 2001; or
 - (b) you are operating towing vessels in violation of the laws on manning either in 46 U.S.C. 8904 or in rules issued under its authority.
- c. How do I renew my OUTV License?
- (1) For your first renewal after May 20, 2001, you must –
- (a) Meet the general requirements in 46 CFR 10.209 (a);
 - (b) Meet the fitness requirement in 46 CFR 10.209 (b);
 - (c) Meet the professional requirements of 46 CFR 10.209 (c)(1) and (2);
 - (d) The intent of 46 CFR 10.209(c)(6) is to require documentary evidence that demonstrates the officer is participating in ongoing training and drills, and will be required for renewals after the initial renewal following May 20, 2001.

Enclosure (1) to NVIC **4-01**

- (e) Provide written evidence of a satisfactory physical examination completed within 12 months of the date of the application as required in 46 CFR 10.209(d);
 - (f) Comply with 46 CFR 10.209 (h) on chemical testing;
 - (g) Comply with any check of criminal records required by 46 CFR 10.209(i);
 - (h) Consent to the NDR check required by 46 CFR 10.209(j); and
 - (i) For a license for Oceans or Near-Coastal routes, meet the requirements on STCW of 46 CFR 10.209 (k).
- (2) At the first renewal after May 20, 2001, you must provide proof of acceptable service. If you cannot, you must show evidence through a completed TOAR for the routes you hold or pass the open book renewal exercise.

d. What is a TOAR?

- (1) It is a document that lists tasks to be performed or explained (as appropriate) in the presence of a designated examiner.
- (2) You may use the sample TOARs [Enclosures 3, 4, 5, and 6] to document proficiency of an apprentice mate (steersman). You may use them to document proficiency without being approved before they are used. If you elect to use a TOAR other than one of the samples, you must submit it to the National Maritime Center for approval.

e. What licenses will you grandfather?

- (1) OUTV, to master of towing vessels
- (2) Master, Steam or Motor Vessels

TONNAGE LIMIT MORE THAN 200 GRT	OUTV ENDORSEMENT¹	TOWING EXPERIENCE²	TOWING SERVICE LENGTH MORE THAN 24 MONTHS	GRANDFATHERED
YES	YES			YES
YES	NO	YES		YES
YES	NO	NO		NO
NO	YES			YES
NO	NO	YES	YES	YES ^{3,4}
NO	NO	YES	NO	YES ⁵
NO	NO	NO		NO

¹ On the License, or the candidate previously held license as OUTV or as Master Freight and Towing

² At least 90 days as operator of towing vessels

³ If the candidate passes OUTV exam, master of towing vessel with no tonnage limitation.

⁴ Limited to the tonnage of the license without exam

⁵ Limited to the tonnage of the license

- (3) 2nd-Class OUTV, to mate (pilot) of towing vessels
- (4) Mate, Steam or Motor Vessels

TONNAGE LIMIT MORE THAN 200 GRT	OUTV ENDORSEMENT ⁶	TOWING EXPERIENCE ⁷	GRANDFATHERED
YES	YES		YES – MASTER OF TOWING VESSELS
YES	NO	YES	YES – MASTER OF TOWING VESSELS
YES	NO	NO	NO
NO	YES		YES – MASTER OR MATE (PILOT) OF TOWING VESSELS
NO	NO	YES	YES ⁸ – MATE (PILOT) OF TOWING VESSELS
NO	NO	NO	NO

- f. If I do not already hold a license as OUTV, but hold one as master or mate of inspected, self-propelled vessels or as first-class pilot with towing experience, what must I do to apply?
 - (1) Whatever license you hold, you must meet the requirements of paragraph 1.c., above.
 - (2) If you have 90 days of towing service and are renewing your license on or after May 21, 2001, then you must document that service to receive a towing endorsement on your license.
 - (3) If you hold a license as master of inspected self-propelled vessels of 200 GRT or less, and are renewing your license and desire an endorsement for towing vessels, we will issue you a license as master of towing vessels limited to the tonnage on the face of your current license, unless you meet the requirements of 1.f.(6) below.
 - (4) If you hold a license as mate of inspected self-propelled vessels of 200 GRT or less, we will issue you a license as mate (pilot) of towing vessels.
 - (5) If you hold a license as master or mate of inspected self-propelled vessels of greater than 200 GRT, we will issue you a license as master of towing vessels.
 - (6) If you hold a license as master of inspected self-propelled vessels of 200 GRT or less and have 24 months or more of experience operating towing vessels, we will remove your tonnage restriction when you successfully complete the following exams administered by the Coast Guard:
 - (a) Rules of the Road.

⁶ If OUTV Endorsement, then grandfathered as master of towing vessel; If 2nd-Class OUTV, then grandfathered as mate (pilot) of towing vessel

⁷ At least 90 days as operator or 2nd-Class OUTV.

⁸ Limited to the tonnage of the license.

- (b) Navigation and Chart Navigation (if the current license is limited to vessels of less than 100 GRT).
 - (c) Deck and Navigation (general) and Deck Safety.
 - (7) If you have no towing experience, you must comply with section 2, 'New Licenses for Towing Vessels' below.
 - g. How can I document my towing experience?
 - (1) (a) You must provide a letter of service from a towing company [46 CFR 10.211(a)]; or
 - (b) You must provide a letter of service from a licensed officer attesting to the towing service. The licensed officer confirming the validity of its contents must sign it. He or she, by signing it, confirms that its contents are true and accurate [46 CFR 10.211(a)]; or
 - (2) The Coast Guard measures qualifying service in months and days as defined in 46 CFR 10.103. Nothing in the rules in effect after May 20, 2001, or this Circular, changes the method of counting service.
 - h. What if I am already training for a towing-vessel license?
 - (1) Until May 21, 2004, a mariner, whose service or training began before May 21, 2001, may qualify for a license as master of towing vessels under the rules for licensing OUTVs in effect before May 21, 2001.
 - (2) A mariner, whose service or training began on or after May 21, 2001, must qualify under the rules for licensing officers of towing vessels in effect on or after May 21, 2001.
 - i. What if I already hold an Oceans endorsement?
 - (1) If you already hold a license as "Master of Steam or Motor Vessels of not more than 200 gross tons (restricted to uninspected towing vessels) upon Oceans and Operator of Uninspected Towing Vessels Great Lakes - Inland," when the licensing rules changed in 1987, your license, if not previously upgraded, would now read:

Master of Towing Vessels upon Oceans and Western Rivers.
 - (2) You may renew your current STCW certificate, but any increase in tonnage authority entails full compliance with STCW as amended in 1995 or later.
2. New Licenses for Towing Vessels. This part applies to any mariner who began service or training on towing vessels after May 20, 2001, and to any other officer seeking a license as officer of towing vessels after May 20, 2001.

a. What if I already hold a license?

- (1) Follow the policy set forth in section 1, 'Existing Licenses for Towing Vessels' above.
- (2) If your experience does not include towing service before May 21, 2001, continue in this section.

b. What are the specific requirements to qualify for a license for towing vessels?

- (1) A towing vessel of at least 26 feet in length, as measured from end to end over the deck, must be operated by a mariner licensed to operate that type of vessel in the particular geographic area [46 U.S.C. 8904(a)] unless it is a vessel of less than 200 GRT involved in the offshore industry exploiting minerals and oil [46 U.S.C. 8905 (b)].
- (2) You must serve on towing vessels. See the abbreviated table below.

<i>License</i>	<i>Total Service</i>	<i>Service</i>	<i>Time on Route</i>	<i>TOAR or Training Program required</i>	<i>Exam</i>	<i>Days of Observation for New Route</i>
<i>Master of towing vessels</i>	<i>48 mo.</i>	<i>Service as mate (pilot)</i>	<i>90 days</i>	<i>NO²</i>	<i>NO²</i>	<i>90 days for increase in the scope of the license.</i>
		<i>18 mos¹</i>				
<i>Mate (pilot) of towing vessels</i>	<i>30 mo.</i>	<i>Service as Apprentice Mate</i>	<i>90 days</i>	<i>YES</i>	<i>NO²</i>	
		<i>12 mo.</i>				
<i>Apprentice Mate (Steersman)</i>	<i>18 mo.</i>	<i>Service on towing vessels</i> <i>12 mo.</i>	<i>90 days</i>	<i>NO</i>	<i>YES</i>	<i>90 days on any route</i>

1 Up to 180 days of harbor assist can be credited.

2. TOAR or approved course and Limited Exam may be required if not previously completed for route.

- (3) You must complete the required examinations.
- (4) You must complete a TOAR and the associated training.

c. What license do I need to operate towing vessels?

- (1) You may operate towing vessels under the restrictions of your current license, until the first renewal of your license on or after May 21, 2001.
- (2) Before May 21, 2001, and until the first renewal after that date, the following licenses are valid for a mariner serving as master on towing vessels:
 - (a) OUTV.

Enclosure (1) to NVIC **4-01**

- (b) Master of inspected self-propelled vessels, within any restrictions on the face of the license.
 - (c) Mate or first-class pilot of inspected self-propelled vessels of more than 200 GRT within any restrictions on the face of the license.
- (3) Before May 21, 2001, and until the first renewal after that date, the following licenses are valid for a mariner serving as mate (pilot) of towing vessels:
- (a) Those listed in paragraph 2.c.(2) above; and
 - (b) Mate or first-class pilot of inspected self-propelled vessels of not more than 200 GRT within any route restrictions on the face of the license.
 - (c) 2nd-Class OUTV.
- (4) On or after May 21, 2006, and after any license transaction following any license upgrade or renewal, an officer operating towing vessels must hold any of the following licenses or endorsements:
- (a) Master of towing vessels.
 - (b) Master of inspected self-propelled vessels greater than 200 GRT with a completed TOAR.
 - (c) Mate (pilot) of towing vessels.
 - (d) Mate of inspected self-propelled vessels greater than 200 GRT with a completed TOAR (limited to serving in the capacity of mate (pilot) of towing vessels).
 - (e) Apprentice mate (steersman) (under the direct supervision of a licensed officer).
- (5) Towing vessels used in conjunction with passenger barges.
- (a) The local OCMI determines the manning required to operate inspected vessels. The officer serving as master may hold either a license as master of inspected, self-propelled vessels, or one as master of towing vessels.
 - (b) Service gained on towing vessels operating in conjunction with passenger barges, that do not require a towing license, will not count as towing service when we are evaluating the license for upgrade.
- d. How old must I be to hold a towing license?
- (1) You must be at least 21 years old to hold a license as master of towing vessels.
 - (2) You must be at least 19 years old to hold a license as mate (pilot) of towing vessels.
 - (3) You must be at least 18 years old to hold a license as apprentice mate (steersman).

e. What is the training procedure for obtaining a towing-vessel license?

The process to train officers of towing vessels, outlined in the rules, uses the best practices existing in the maritime, and more specifically the towing, industry. You must also (see the following chart)—

- (1) Pass the examination for apprentice mate (steersman) given by the Coast Guard; and
- (2) Either –
 - (a) Demonstrate proficiency and be evaluated by a designated examiner against published performance measures; or
 - (b) Complete an approved course.

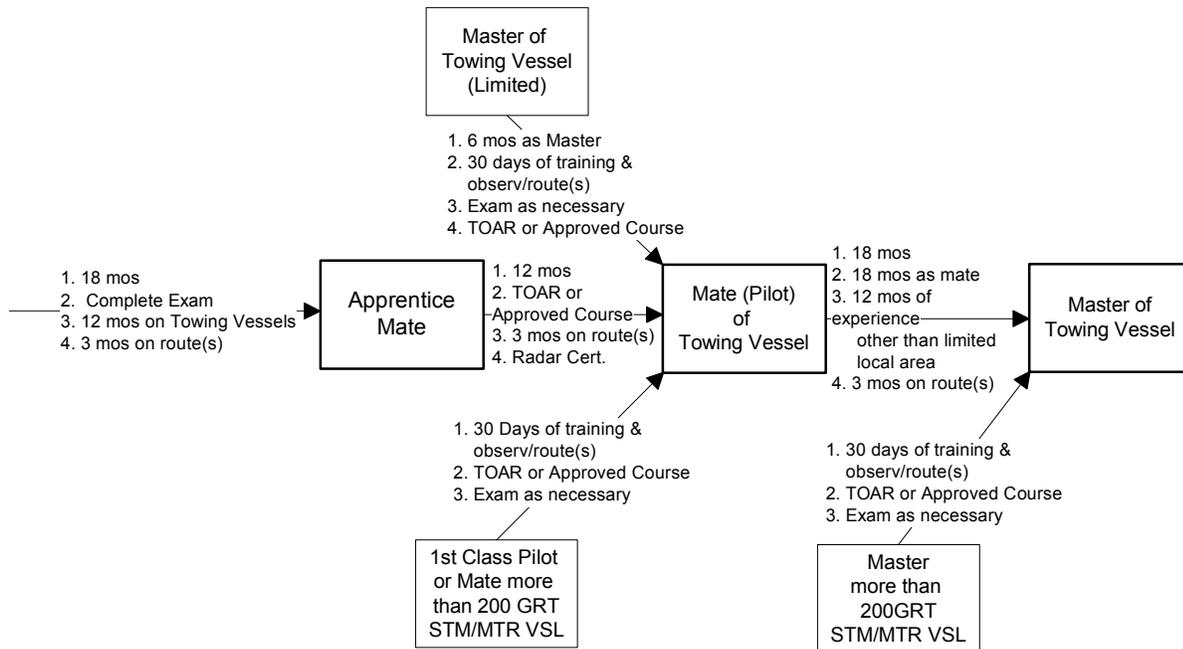


Figure: License Progression

Enclosure (1) to NVIC 4-01

f. What is a TOAR?

- (1) It is a document that lists tasks to be performed or explained (as appropriate), in the presence of a designated examiner.
- (2) The sample TOARs [Enclosures 3, 4, 5, and 6] may serve to document proficiency of an apprentice mate (steersman) or when required for change of route or license crossover. They may serve to document proficiency without being approved before use. If you use a TOAR other than one of the samples, you must submit it to the National Maritime Center for approval.

g. How do I document proficiency?

- (1) Document demonstration of proficiency through completion of a training course or a steersman program (which may include simulator training) approved by the Coast Guard.
 - (a) The course must satisfy 46 CFR 10.465(g), containing –
 1. Formal instruction; and
 2. Practical demonstrations of proficiency either on board a towing vessel or at a shore-side training facility before a designated examiner.
 - (b) The training must cover –
 1. Shipboard management and training;
 2. Seamanship;
 3. Navigation;
 4. Watchkeeping;
 5. Radar;
 6. Meteorology;
 7. Maneuvering and handling of towing vessels;
 8. Engine-room basics; and
 9. Emergency procedures.
 - (c) Submit training programs to NMC for review and approval under NVIC 5-95 or later valid Circular on approved courses.
- (2) You may use the TOAR to document demonstrated proficiency. See paragraph 2.f. of this section.

- (a) Your observation and assessment, documented in the TOAR, may take place over time, while on the job. A compressed “check ride” is not necessary.
- (b) The designated examiner may be a towing-vessel officer or other person who—
 - 1. Satisfies the requirements of NVIC 6-97; or,
 - 2. Meets the following criteria:
 - a. Hold a license equal to or superior to the one for which you are assessing performance.
 - b. Possess recent experience in the tasks you are assessing.
 - c. Meet one of the following criteria –
 - (1) Have received formal instruction in observation and assessment techniques; or,
 - (2) Have experience conducting assessments of competence such as experience assessing junior mates or pilots as part of a program run by a company for training apprentice mates (steersman), or as part of a safety management system.
 - 3. Requests for approval as a designated examiner are submitted to the National Maritime Center and must include a description of the mariner’s qualifications specific to the tasks to be assessed.
- (c) Towing Officer’s Assessment Record (TOAR):
 - 1. Model TOARs are enclosures (3) through (6) to this Circular.
 - 2. If a company changes elements of the TOAR, the NMC must review and approve it before use. Company-specific elements added to the end of the TOAR need not go to the NMC.
 - 3. To obtain a license as mate (pilot) of towing vessels use the following list to determine the appropriate TOAR.
 - a. If you are seeking a license as mate (pilot) of towing vessels (Western Rivers) complete the TOAR for Western Rivers.
 - b. If you are seeking a license as mate (pilot) of towing vessels (Great Lakes–Inland) complete the TOAR for Great Lakes–Inland.
 - c. If you are seek a license as mate (pilot) of towing vessels (Oceans) or (Near-Coastal waters) complete the TOAR for Near-Coastal and Oceans. If you complete the TOAR for Near Coastal and Oceans, you do not need to complete the TOAR for Great Lakes–inland waters.

- d. If you are seeking a license for a limited geographic area, such as a fleeting area or harbor, complete the Limited TOAR.
4. TOARs should include essential measures of performance (which tasks or functions are necessary to perform and be observed) and, if possible, simply state the performance standards or assessment criteria (conditions that satisfy completion of the task).
 5. Until the assessment criteria (performance measures) are developed, designated examiners should be guided by company policy and industry practice when assessing candidates using the TOAR.
- (3) If you are renewing your license, you may satisfy 46 CFR 10.209 (c)(6)(ii) by providing the letter of service described in paragraph 1.g.(1), above. The letter must document evidence of ongoing safety training and of safe operation of vessels.
- h. How much of the TOAR must a candidate complete?
- (1) The apprentice mate (steersman) must demonstrate his or her ability to perform all the performance criteria in the TOAR before being upgraded to mate. This process will likely be gradual.
 - (2) A designated examiner must witness and sign off each performance criterion.
 - (3) Only the designated examiner can verify that the apprentice mate (steersman) is proficient in each task and duty.
 - (4) The designated examiner may mark “not applicable” tasks or duties when not assessed or required on a specific vessel as a result of a limited route. Any performance criteria not assessed must be assessed before a license’s route can increase.
 - (5) Before a license may be returned to the following mariners, they must demonstrate proficiency before designated examiners on the items within the TOARs for the routes previously held:
 - (a) Those seeking return of their licenses after administrative action against their licenses for incompetence.
 - (b) Those seeking re-issuance of licenses more than 12 months after their previous licenses expired.
 - (c) Those seeking to have continuity endorsements rescinded from inactive licenses, under 46 CFR 10.209 (g).

- i. How do I obtain a license for towing vessels if I don't have towing experience?
 - (1) A master of inspected self-propelled vessels greater than 200 GRT may obtain authority to serve as master of towing vessels if he or she –
 - (a) Has 30 days of training and observation on towing vessels on the appropriate routes (except for Western Rivers, which requires 90 days of training and observation);
 - (b) Holds a completed TOAR or evidence of completion of a Coast Guard approved course that exhibits evidence of favorable assessment of practical demonstration of towing skills; and
 - (c) Passes any required examination.
 - (2) A mate or first-class pilot of inspected self-propelled vessels greater than 200 GRT may obtain authority to serve as mate of towing vessels (restricted to the service presented) if he or she –
 - (a) Has 30 days of training and observation on towing vessels over the appropriate routes (except for Western Rivers, which requires 90 days of training and observation);
 - (b) Holds a completed TOAR or evidence of completion of a Coast Guard approved course that exhibits evidence of favorable assessment of practical demonstration of towing skills; and
 - (c) Passes any required examination.
 - (3) A master or mate of a self-propelled vessel of 200 GRT or less may obtain an endorsement for towing vessels through the training and assessment outlined in the regulations. This involves completing a TOAR or a Coast Guard approved course and in-service training and assessment.
- j. How do I obtain an Oceans endorsement?
 - (1) You must –
 - (a) Hold a valid firefighting certificate meeting basic and advanced criteria for training [46 CFR 10.207(f)];
 - (b) Hold an appropriate radar-observer qualification [46 CFR 10.205];
 - (c) Qualify as an able seaman [46 CFR 10.401(g)]; and
 - (d) Complete the further examination requirements for an Oceans endorsement.
 - (2) You must satisfy the STCW requirements, see section 5 of this enclosure.

- (3) You must have experience operating towing vessels seaward of the boundary line. The difference between the Oceans and the Near Coastal endorsement is the examination [46 CFR 10.910].
3. Towing-Vessel Licensing in General. This part applies to all transactions respecting licenses.
- a. What do I need to renew my license as master of towing vessels?
 - (1) Meet the general requirements in 46 CFR 10.209 (a).
 - (2) Meet the fitness requirement in 46 CFR 10.209 (b).
 - (3) Meet the professional requirements in 46 CFR 10.209(c)(1) and (2). Documentation for sea service needs the following information –
 - (a) Service, computed in 8-hour days.
 - (b) Identification of vessel name, type, and gross tonnage or gross register tons.
 - (c) Identification of the area of operation (Western Rivers, Great Lakes - Inland, Near Coastal or Oceans). Recency on each route on the current license is not necessary.
 - (d) Statement of the position served on each vessel.
 - (4) Prove that you have either --
 - (a) Completed a practical demonstration, or
 - (b) Participated in ongoing training and drills during the validity of your license.
 1. If employed by a company in a safety management system, such as the International Safety Management (ISM) Code or the American Waterways Operators (AWO) Responsible Carrier Program, the documentation needs only a statement that the company was involved in a safety-management system.
 2. Otherwise, you must prove that the company vessels conduct regular safety training and drills.
 - (5) Provide written evidence of a satisfactory physical examination completed within 12 or fewer months of the date of application [see 46 CFR 10.209(d)];
 - (6) Meet the chemical-testing requirements for dangerous drugs in 46 CFR 10.209(h);
 - (7) Comply with any criminal-records check required by 46 CFR 10.209(i);
 - (8) Consent to the NDR check required by 46 CFR 10.209(j); and

- (9) For any license for Oceans or Near Coastal routes, satisfy 46 CFR 10.209 (k) respecting STCW.
- b. How do I qualify as a designated examiner?
 - (1) You must satisfy the requirements in NVIC 6-97; or,
 - (2) You must meet the following criteria:
 - (a) Hold a license equal or superior to the one for which you are assessing performance.
 - (b) Possess recent experience in the task you are assessing.
 - (c) Meet one of the following criteria:
 - 1. Have received formal instruction in techniques of observation and assessment.
 - 2. Have experience conducting assessments of competence such as experience assessing junior mates or pilots as part of a program run by a company for training apprentice mates (steersman), or as part of a safety management system.
 - (3) Requests for approval as a designated examiner are submitted to the National Maritime Center and must include a description of the mariner's qualification specific to the tasks to be assessed.
- c. What is the difference between "mate" and "pilot" of towing vessels?
 - (1) There is none in practice. But, on the Western Rivers, the term "mate" has historically referred to the senior deckhand on a vessel while the term "pilot" has historically referred to the individual operating a riverboat.
 - (2) The license is endorsed "mate (pilot) of towing vessels" unless the applicant specifically requests one or the other.
 - (3) When a mariner holds an endorsement as pilot and seeks one as mate or vice-versa, we will assess only an issuance fee, unless the transaction requires evaluation and examination.
- d. What issues of recency does this rule add?

None – recency remains the same as in 46 CFR 10.202(e).

Enclosure (1) to NVIC **4-01**

e. What new examinations are required?

None, the license examinations will remain the same after the implementation date of the new rule except we will give them before our issuing the apprentice mate (steersman) license.

f. What route examinations are required?

Adding a route may not require an examination unless the new route requires further evidence of knowledge. For example:

If you are:	And you are looking to obtain a master of towing vessel upon:	Then you
A master of towing vessels upon Near Coastal or Great Lakes—Inland Waters	Oceans	Must take an Examination for Celestial Navigation, etc.
A master of towing vessels upon Oceans	The Western Rivers	Will not have to take an examination.
A master of towing vessels upon Near-Coastal Waters	Great Lakes—Inland Waters	Will not have to take an examination

(2) Rules of the Road. You must take the exam on rules of the road to upgrade a license in some instances if it has been more than 12 months since your last license transaction.

g. Are there tonnage restrictions on the towing vessel license?

(1) In general no; however, some officers' licenses converted under grandfathering may have tonnage limitations included. Such tonnage limitations would be removed when the officer meets the examination and experience requirements of 46 CFR 10.210.

(2) You may not use the license as master or mate of towing vessels on inspected vessels, regardless of tonnage. In addition, a towing vessel of 200 GRT or over, beyond the boundary line, must be operated by an officer holding a license as master or mate of inspected self-propelled vessels of appropriate tonnage, with the master or mate (pilot) of towing vessels endorsement, or hold a completed TOAR

(3) You must hold a valid STCW certificate if you serve on a seagoing towing vessel 200 GRT or more, or on any towing vessel operating on international voyages.

h. What is a Limited Local Area Route?

(1) It is a specific waterway or section of one. Applying for a limited local area route provides the option of taking a simplified or limited examination. This recognizes

that towing vessels do not always provide an opportunity to gain extensive experience on a specific route. In such cases a limited examination and TOAR tailored specifically to the service and geographic area will suffice.

- (2) Limited local area routes may not substitute for Near-Coastal routes or Oceans routes.
- (3) When requested, OCMI's should liberally interpret their authority to issue licenses with limited local area routes. For example, if a master of towing vessels, upon Western Rivers, wants to operate on the Gulf Intercoastal Waterway, but not take the entire exam for inland towing vessels, the OCMI could consider the following criteria and issue a limited local area route:
 - (a) Is the length of the route reasonable; and
 - (b) Is operation consistent with the officer's previous experience?
- (4) The OCMI may modify an inland exam by deleting inappropriate questions and may issue an inland endorsement with appropriate limitations, following the period of observation and training listed in 46 CFR Table 10.464-3.
- (5) An example for limited local area for towing vessels as used in the Eighth Coast Guard District
 - (a) Limited Area [OUTV] Western Rivers for less than 10 miles.
 1. 361XX Deck General (questions inappropriate to the limited area eliminated).
 2. 066XX Navigation Rules (questions inappropriate to the limited area eliminated).
 3. Map sketch of area of operations (showing major landmarks, outline of river, hazards, and aids to navigation).
 4. 072X4 Navigation General (questions inappropriate to the limited area eliminated).
 - (b) Limited Area [OUTV] Western Rivers for areas more than 10 miles but less than 100 miles.
 1. 361XX Deck General.
 2. 066XX Navigation Rules.
 3. 07501 Navigation Problems.
 4. 072X4 Navigation General.

- i. Can I move from towing vessels to other types of vessels?
 - (1) Yes. The rules leave in place the progression from towing service to service on other types of vessels.
 - (2) When we are evaluating service for license advancement, we would count a person holding a license as Operator of Uninspected Towing Vessels (OUTV) as a master of towing vessels. We would also count service under the license as OUTV, until May 21, 2001, as that of master of towing vessels.
- j. Were there changes to the pilotage rules?

Nothing within the recent rulemakings on towing vessels changes the requirements for pilotage within 46 CFR Part 10, subpart G, or the manning requirements in 46 CFR 15.812.

- k. Can my assistance-towing service count toward a towing license?

No, the duties in assistance towing are not comparable to those on an inspected or uninspected towing vessel, and this service may not count toward the service time necessary for master or mate (pilot) of towing vessels.

4. Manning. This part describes the manning required for towing vessels.

- a. What is the manning required for a towing vessel after May 21, 2006?
 - (1) One master of towing vessels or master of inspected self-propelled vessels greater than 200 GRT holding a completed TOAR.
 - (2) If the vessel requires a second licensed officer, another officer holding one of the following licenses:
 - (a) A license listed in 4.a.(1).
 - (b) Mate (pilot) of towing vessels.
 - (c) Mate of inspected self-propelled vessels, greater than 200 GRT, holding a completed TOAR.
- b. What is the manning required for a towing vessel between May 20, 2001, and May 21, 2006?
 - (1) One officer designated to be the master and holding one of the following licenses:
 - (a) Master of towing vessels (master of towing vessels (Limited) when operating solely within a local limited area);
 - (b) OUTV;

- (c) Master of inspected self-propelled vessels within any restrictions on the officer's license, while holding a completed TOAR;
 - (d) Master of inspected self-propelled vessels within any restrictions on the officer's license; or
 - (e) Mate or pilot of inspected self-propelled vessels with a license whose tonnage limitation is greater than 200 GRT (Domestic service only).
- (2) Another officer, if required, holding one of the following licenses:
- (a) A license listed in 4.b.(1), above;
 - (b) Mate (pilot) of towing vessels;
 - (c) 2nd-Class OUTV;
 - (d) Mate of inspected self-propelled vessels within any restrictions on the officer's license, while holding a completed TOAR; or
 - (e) Mate of inspected self-propelled vessels within any restrictions on the officer's license.
5. International Convention on Standards of Training, Certification, and Watchkeeping (STCW)
This part briefly describes the requirements of STCW for officers on towing vessels.
- a. Who must comply with STCW on towing vessels?
Each officer on seagoing towing vessels must comply with STCW.
 - b. What level of compliance is necessary for officers on seagoing towing vessels?
 - (1) The following answers are general answers to the requirements on STCW. Specific information appears in other Circulars about STCW or is available from the local REC.
 - (2) Each officer on international voyages must fully comply with STCW, and hold a license authorizing service on inspected self-propelled vessels of appropriate tonnage, and the accompanying STCW certificate.
 - (3) Each officer on any seagoing towing vessels over 200 GRT must fully comply with STCW and hold a license authorizing service on inspected self-propelled vessels of appropriate tonnage, and the accompanying STCW certificate.
 - (4) Each officer on near coastal towing vessels of less than 200 GRT must meet all licensing requirements and have his or her license endorsed for STCW. No STCW certificate is necessary.

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