



16714/160.133
16714/160.135
June 3, 2009

To: Manufacturers of USCG approved SOLAS lifeboats, rescue boats, and release mechanisms

Subj: POLICY ON RETROFITTING NON-OEM RELEASE MECHANISMS INTO EXISTING USCG APPROVED LIFEBOATS

We have recently seen an increasing interest in retrofitting release mechanisms different to those originally approved with existing USCG approved lifeboats. In the past, we have not typically restricted such retrofits provided the replacement hook is of the same or greater safe working load. Now, however, with the promulgation of IMO MSC.1/Circ.1205 "Guidelines for developing operation and maintenance manuals for lifeboat systems", IMO MSC.1/Circ.1206 "Measures to prevent accidents with lifeboats", and our associated NVIC 04-07 "Servicing and maintenance of lifeboats, launching appliances and on-load release gear", to be consistent with IMO recommendations on the matter we are adopting more of a systems approach for future such retrofits. This approval will also ensure adequate documentation of modifications to approved equipment for port state control purposes.

Accordingly, in the future, if a different USCG approved releasing gear under approval series 160.133 than that provided by the original lifeboat/rescue boat manufacturer is proposed for installation on a USCG approved boat under approval series 160.135 and/or 160.156, the change must be submitted to us in advance for review and approval. Any such submission should clearly document any consultation with the original manufacturer of the boat, where available, and the outcome of that consultation. We will consider instances of non-concurrence by the original equipment manufacturer for technical reasons on a case-by-case basis. Where no original manufacturer, or holder of the original certificate and/or design exists, the facility requesting to undertake the replacement must demonstrate, to the satisfaction of the OCMI, their ability to make the modifications to the boat consistent with the qualifications outlined for service providers in IMO MSC.1/Circ.1277 "Interim recommendation on conditions for authorization of service providers for lifeboats, launching appliances and on-load release gear".

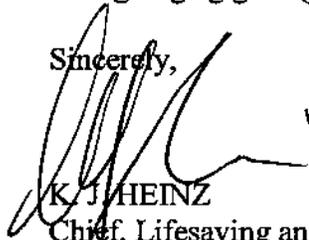
Each submission must include revised drawings, structural analysis of the change and a revised copy of the Operations and Maintenance Manual for the boat, in a format consistent with MSC.1/Circ.1205, that incorporates the new release gear. If the materials submitted are acceptable, we will, at a minimum, require the on-load/off-load test, paragraph 2/5.3.1, and the bedding test, paragraph 2/5.3.4, of IMO Resolution MSC.81(70), as amended by Resolution MSC.226(82), to be performed prior to re-entry into service of the boat.

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Once all conditions above have been met, the owner of the modified boat must be provided with the revisions to the Operations and Maintenance manual and a copy of the letter from us approving the change. If you have any questions regarding this letter, please contact Mr. George Grills of my staff at (202) 372-1385 or e-mail george.g.grills@uscg.mil.

Sincerely,



K. J. HEINZ
Chief, Lifesaving and Fire Safety Division
U.S. Coast Guard
By direction

Copy: CG-5431
Independent laboratories for approval series 160.133, 160.135 & 160.156