MEMORANDUM OF UNDERSTANDING BETWEEN

THE MARITIME ADMINISTRATION

AND

U.S. COAST GUARD

(Ready Reserve Force Inspection and Certification)

I. **Purpose**. This Memorandum of Understanding (MOU) is an agreement which sets forth the procedures to be followed by the Maritime Administration (MARAD) and the United States Coast Guard (USCG) in providing inspection and certification services for certain vessels designated for rapid response to Department of Defense (DOD) contingency sealift requirements.

II. **Background**. The Ready Reserve Force (RRF), started in 1976, is a component of the National Defense Reserve Fleet (NDRF). It has grown to represent a significant portion of the United States forces' early deployment capability. The RRF is a key element of the Navy's Strategic Sealift Program, designed to provide assured, responsive shipping to support the rapid worldwide deployment of U.S. military forces. It is structured for quick response (ship availability) beyond that readily obtainable from U.S. commercial shipping. These vessels are maintained in a deactivated status in the NDRF (i.e., James River, Virginia; Beaumont, Texas; and Suisun Bay, California) or other designated sites.

Although ships of the RRF are Public Vessels, they are required to be inspected by the USCG in accordance with 46 USC §2109.

Each RRF vessel is or will be assigned to an American-flag ship management company which acts on behalf of MARAD as the Ship Manager/General Agent for the vessel in all phases of RRF activities.

III. **Program**. To meet DOD rapid response requirements, MARAD shall maintain RRF vessels in full compliance with the applicable laws, rules and regulations, even while laid-up, to the maximum extent possible as modified by the inspection schedule in Annex I. To satisfy contingency sealift requirements of the DOD, MARAD has developed a 7-phase program for RRF vessels including:

PHASE I	ACQUISITION
PHASE II	UPGRADE
PHASE III	DEACTIVATION (Initial)
PHASE IV	MAINTENANCE
PHASE V	EXERCISE (Activation/Layup)
PHASE VI	SEALIFT ENHANCEMENT FEATURES
PHASE 0	OPERATIONS

A brief description of each phase and the USCG involvement follows[1]:

A. Phase I - Acquisition

No USCG involvement is normally required during this phase unless vessels are being reflagged from foreign registry; however, existing USCG inspection history and vessel files, if any, may be reviewed by MARAD. USCG advice should be requested early in this phase if reflagging of foreign vessels is involved.

B. Phase II - Upgrade

During the upgrade phase, all outstanding work items and regulatory body requirements to place the vessel in class and certification are to be accomplished. The vessel will be drydocked for repairs and inspection. Repairs will be accomplished as required to ensure that the vessel is capable of steaming continuously in unrestricted operations for at least 180 days in execution of its assigned sealift mission. Additionally, repairs will be accomplished to ensure that the vessel, when in Phase IV (Maintenance), can be maintained in its assigned readiness status. The USCG marine inspector will designate fuel oil tanks to be cleaned and gas freed in order to meet the mandatory requirement for internal examination of a representative sample of structural tanks.

Dock and sea trials will be held when deemed necessary (e.g., vessel has been laid-up or out of service for an extended period). MARAD shall request an inspection for certification as part of Phase II (Upgrade) for a vessel whose current Certificate of Inspection (COI) will expire within one year after assignment to RRF status. MARAD may request an inspection for certification on a vessel whose COI has a year or more remaining, based on the condition of the vessel.

The cognizant USCG Officer in Charge, Marine Inspection (OCMI) will provide the inspection and certificate. When the OCMI is satisfied that the vessel may be safely operated in its intended service and the vessel complies with the applicable laws, rules, and regulations, he will issue a COI.

C. Phase III - Deactivation (Initial)

Vessels will be prepared for active retention during Phase III, Deactivation (Initial). Upon commencement of deactivation, the cognizant OCMI shall maintain a file containing copies of all requirements (Form CG-835) issued to the vessel, and all applicable correspondence. MARAD will ensure that only a minimal number of material deficiencies remain outstanding upon deactivation. As a general rule, only those items which will require operational testing upon reactivation of the vessel will remain outstanding upon deactivation.

When one piece of correspondence applies to more than one RRF vessel, a copy shall be inserted into each applicable OCMI vessel file. In the event MARAD transfers one or more of the vessels to another OCMI zone, MARAD shall advise the OCMI holding the vessel file and request the file be transferred to the new cognizant OCMI. Such vessel transfers will not require special inspections as long as the vessel has a currently valid COI.

[1] Additional information on MARAD's vessel preparation and maintenance activities in the RRP program is included in Annex II.

D. Phase IV - Maintenance

During this phase vessels will be maintained in accordance with American Bureau of Shipping (ABS) class standards, USCG certification and other U.S. regulatory requirements. MARAD Ship Managers/General Agents shall arrange for required periodic inspections and tests in accordance with Annex I to this MOU.

The USCG shall provide biennial inspection services and may provide mid-period inspection services upon request during Phase IV. MARAD, in conjunction with the assigned Ship Manager/General Agent, will prepare the vessel for inspection and provide all services required by the USCG marine inspector. Where material deficiencies are noted or required inspections or tests are impractical, requirements (Form CG-835) will be issued by the cognizant OCMI.

Requirements shall be satisfied not later than one year after the completion of the inspection for certification for RRF vessels to retain their certificated status. This allows MARAD flexibility to schedule needed work to coincide with vessel drydock examinations, activations or deactivations following operations. Upon completion of an inspection for certification during this phase, a copy of the new COI and a list of outstanding requirements and required completion dates will be delivered to the cognizant MARAD Region for their records

MARAD Regions may appeal any decision of the OC~I of which they are aggrieved as outlined in section VI of this MOU. Failing the granting of an appeal, the OCMI's may remove RRF vessels from certificated status if material deficiencies remain uncorrected beyond the following periods: (a) if issued at the inspection for certification, a one year period will be allowed for completion; and (b) if issued at any inspection other than inspection for certification, a period of one year after the completion of the next inspection for certification will be allowed for completion. These time periods apply only when the vessels are in Phase IV (Maintenance). OCMI's may extend the completion dates of requirements at their discretion. The cognizant OCMI will retain the original list of requirements for inclusion in the vessel file. Certification requirements will be recorded in the USCG Marine Safety Information Systems (MSIS).

During this phase, MARAD will endeavor to make RRF vessels available to the USCG for training marine inspectors, and other training exercises agreeable to both agencies.

E. Phase V - Exercise (Activation/Lay-up)

Activation of vessels from the RRF will be initiated by MARAD. Each vessel activated shall undergo a sea trial to demonstrate satisfactory operation of all ship's equipment and systems. The vessel will be subject to all normal regulatory body testing and inspection requirements.

MARAD shall immediately notify the cognizant OCMI and USCG Commandant (G-MVI)/(G-MVP) when any activation is to occur, identifying the MARAD and Ship Manager/General Agent points of contact, phone numbers, the activation shipyard or facility, and the vessel readiness status. All operational testing of equipment and systems as required shall be conducted to the satisfaction of the USCG inspector (including testing

of fire pumps, steering motors, generators, safety valves, relief valves, fire hoses, liferafts, lifejackets, etc.).

During the activation, the OCMI will conduct a deficiency check to ensure that outstanding requirements (Form CG-835) issued during the Phase IV (Maintenance) period have been corrected. Request for waiver for material deficiencies that cannot be corrected, should be initiated in accordance with Section V of this MOU.

When the activation has been completed under Phase V (Exercise/Activation), the vessel may enter Phase 0 (Operation). When operations have been completed, the vessel will re-enter Phase V (Exercise/Lay-up) for lay-up and preparation for retention and return to Phase IV (Maintenance) status. Lay-up of the vessel will be accomplished with the procedures described for deactivation in Annex II. MARAD may apply for a new COI at this time.

F. Phase VI - Sealift Enhancement Features

This phase involves the installation of specific mission-related sealift enhancement equipment including underway replenishment delivery systems, astern and alongside refueling rigs, cargo gear modifications, and communications upgrading. Such modifications shall be carried out under the cognizance of the USCG as appropriate.

G. Phase 0 - Operation

During this phase RRF vessels will normally come under the operational control of the DOD, through the Military Sealift Command. During this time, MARAD will maintain the vessels in ABS class and USCG Certification. All those normally due regulatory survey services will be provided by USCG and ABS as necessary per the. schedule for normal operating commercial vessels.

IV. **Application for Inspection**. When USCG inspection service is desired and/or required for certification, drydock examination, reinspection, or activation for service, the MARAD Ship Manager/General Agent shall submit a written request or an Application for Inspection (Form CG-3752) to the cognizant OCMI stating the name and official number of the vessel and the date and location of the desired inspection or examination (see Annex III, paragraph 3.b). Any outstanding requirements will be noted and attached to the request for inspection together with an estimate of their anticipated completion date. The inspection request shall be submitted in as timely a manner as possible.

V. **Application for Waiver**. When it is determined that compliance with the applicable laws or regulations is not compatible with the operational requirements for a specific vessel, waiver of specific regulations may be requested in the interest of national defense. Such requests will be initiated by DOD and coordinated with MARAD. Waiver requests will be submitted, in writing, to the cognizant USCG District Commander or his designated representative in accordance with 46 CFR §6.01.

During short notice activations of the RRF for rapid deployment of U.S. forces to crises situations or upon declaration of war or national emergency, the Commandant, District Commander or their designated representative is authorized to grant temporary waivers, at the direct request of MARAD, for material deficiencies that do not adversely affect the safety of the vessel or crew. The

waiver procedure contained in 46 CFR §6.01(d) should be followed for oral waiver applications. The cognizant OCMI may grant such waiver if so designated by the Commandant or the appropriate District Commander. If the deficient item cannot be corrected during the brief deferral period granted by the Commandant, District Commander or their designated representative, MARAD or its authorized representative should seek a written national defense waiver, through DOD.

VI. **Appeals**. Any decision of the OCMI may be appealed to the Commandant in accordance with 46 CFR §2.01-70 and 46 CFR S1.03. Where the decision of an OCMI threatens to seriously compromise response to any operational DOD requirement, the cognizant MARAD official may request an immediate conference between MARAD's Associate Administrator for Shipbuilding and Ship Operations (Executive Director, National Shipping Authority) and the USCG's Chief, Office of Marine Safety, Security and Environmental Protection. MARAD shall notify the cognizant OCMI and District Commander if and when such action is taken; furthermore, such action will not relieve the Ship Manager/General Agent or MARAD from concurrent compliance with normal appeal procedures.

VII. **Coordination** Local operating-level meetings of OCMIs, MARAD and Ship Managers/General Agents are encouraged and should ' be held at least annually in order that this MOU be fully understood by all parties.

VIII. **Implementation** This agreement replaces the current MOU and becomes effective upon signature by both parties and may be amended at any time by mutual consent. This agreement may be terminated at any time upon delivery of written notification of termination from either party. Such written termination must be bear the signature of one of the original signatories or his successor.

A.E. HENN
Rear Admiral, U.S. Coast Guard
Chief, Office of Marine Safety,
Security and Environmental Protection

Signed at Washington, D.C. this 25th day of MARCH 1993.

H.T. HALLER
Associate Administrator for
Shipbuilding and Ship Operations
Maritime Administration

Attachments: Annex I - Inspection Intervals for RRF Vessels
Annex II -General Deactivation & Maintenance Procedures
Annex III -Command, Control & Communications

ANNEX I
TO
MARAD/USCG MOU ON RRF INSPECTION AND CERTIFICATION

INSPECTION INTERVALS FOR RRF VESSELS

Unless the system/element is modified below, the inspection interval shall be as prescribed in the appropriate USCG regulations.

	Inspection	Applicable USCG Rule (Note 1)	Normal Interval	Modified Inspection Interval
1.	Boiler Hydrostatic Test	61.05-10	4 years	At 4 year intervals but may be extended to Phase V (Exercise/Activation). (Note 2)
2.	Boiler Safety Valve Test	61.05-20(a)	2 years	At each inspection for certification but may be extended to Phase V (Exercise/Activation). (Note 1 & Note 2)
3.	Boiler Valve Examination	61.05-15(a)	4 years	During Phase II (Upgrade) open and examine boiler valves; thence at 4 year intervals but may be extended to Phase V (Exercise/Lay-up). (Note 2 & Note 3)
4.	Remove and Examine Boiler Mountings and Studs	61.05-15(b), (c)	8 years	During Phase II (Upgrade), examine mounting and replace studs as required; thence at 8 year intervals but may be extended to Phase V (Exercise/Lay-up). (Note 2 & Note 3)
5.	Pressure Vessel Examination	61.10-5(a), (b)	2 years	Prior to placing in service but not less than 2 years after it was last examined and hydrostatically tested, if required. (Note 2)
6.	Pressure Vessel Relief Test	61.10-5(i)	2 years	At each inspection for certification but may be extended to Phase V (Exercise/Activation). (Note 2)
7.	Steam Piping Hydrostatic Test	61.15-5(a), (b)	4 years	At 4 years intervals but may be extended to Phase V (Exercise/Activation). (Note 2)
8.	Steam Piping Safeties Test	61.15-5(c)	2 years	At each inspection for certification but may be extended to Phase V (Exercise/Activation). (Note 2)

Inspection	Applicable USCG Rule	Normal Interval	Modified Inspection Interval
9. CO_2 Bulk Storage Tanks Hydrostatic Test	61.10-5(a)	8 years	At 8 year intervals.
10. Inflatable Liferaft Servicing	33.25-15(d) 91.25-15(a)(6)	1 year	Approved and serviced equipment to be provided during Phase V (Exercise/Activation). (Note 2)
11. Inflatable Liferaft Hydraulic Release Servicing and Testing	33.25-15(e) 91.25-15(a)(8)	1 year	As in item 10 above. (Note 2)
12. Portable CO_2 Extinguisher Cylinder Test	147.60 49 CFR §173.34	5 years	As required by USCG rule. (Note 2)
13. Fixed CO_2 Extinguisher Hydrostatic Test	147.65	12 years	During Phase II (Upgrade); thence at 12 year intervals.
14. Cargo Gear Examination (Visual)	31.37-1(b) 91.37-1(d)	1 year	Prior to operation of gear but not less than 1 year after prior examination. (Note 2)
15. Cargo Gear Dismantling and Proof Load Testing	31.37-1(d) 91.37-1(d)	4 years	During Phase II (Upgrade); thence at 4 or 5 (as permitted by 46 CFR, parts 31 & 91) year intervals (as applicable) but may be extended to Phase V (Exercise/Lay-up). (Note 2 & Note 3)
16. Cargo Ship Safety Equipment Certificate	31.40-10 91.60-10	2 years	As required by USCG rule.
17. Cargo Ship Safety Construction Certificate	31.40-5 91.60-5	5 years	As required by USCG rule.
18. Cargo Ship Safety Radio Certificates	31.40-15,20 91.60-15,20	1 year	As required by FCC, during Phase V (Exercise/Activation).
19. International Oil Pollution Prevention (IOPP) Certificate	MARPOL 73/78	4 years with annual endorsement (tankships: various)	As required by MARPOL 73/78.
20. Ring Buoy Self-activating Smoke Signal	33.40-5(c) 94.43-10(c)	3 years	As required. Up-to-date equipment to be maintained whether onboard or in an adjacent facility. (Note 2)
21. Red Flare and Orange Smoke Distress Signals	33.45-94.90	3 years	Same as 20 above.
22. Internal Structural Examination	31.10-21 91.40-3	2.5 years or 5 years for vessels laid up in fresh/brackish water.	As required by USCG rule.

Inspection	Applicable USCG Rule	Normal Interval	Modified Inspection Interval
23. Fuel Oil Tank Inspection	31.10-24 91.43-1	5 years	At 5 year intervals, but may be extended to Phase V (Exercise/lay-up).
24. Tailshaft Drawing/Examination (for oil lubricated stern tube bearings).	61.20-15	5 years (for fresh water)	At 5 or 10 years intervals. (Note 4, Note 5 & Note 6)
25. Drydocking	31.10-21 91.40-3	5 years (for fresh water)	At 5 or 10 year intervals. (Note 4, Note 5, & Note 6)

Notes:

1. Title 46 Code of Federal Regulations unless otherwise noted.

2. Extensions of tests and/or inspections required during Phase IV shall be granted if requested by the Ship Manager/General Agent in coordination with the cognizant MARAD Regional Office as follows:
a. If the test and/or inspection is required as part of an inspection for certification then an extension of one year from the date of issuance of the new COI will be allowed for completion.
b. If the test and/or inspection is required as part of either a mid-period or special inspection, then an extension of one year after the next inspection for certification will be allowed for completion.

3. All tests and/or inspections which are extended during Phase IV (Maintenance) (as per note 2 above) or Phase V (Exercise) should be completed immediately upon activation in Phase V (Exercise). Those items that the OCMI, determines after consultation with MARAD, cannot be reasonably completed during activation, shall be completed not more than nine months after the vessel enters and remains in Phase O (Operation). If the vessel returns to Phase V (Exercise/Lay-up) prior to the end of six months of operation, MARAD will complete all requirements and inspections upon vessel deactivation.

4. All vessels are required to be drydocked after 3 years accumulated activation time; Phase V (Exercise/Activation) plus Phase O (Operation) time.

5. Ten year drydock interval: If properly prepared as described in Annex II, and provided activation time does not exceed three years in 10 (as in note 4 above), a vessel will be drydocked at 10 year intervals minus activation time. Vessel in the 10 year program must satisfactorily complete an underwater survey at year 5 as described in Annex II.

6. Five year drydock interval: If a vessel is not properly prepared for a 10 year interval as in note 5 above, or is not eligible for the 10 year interval, and provided activation time does not exceed three years in 5, a vessel will be drydocked at 5 year intervals (as in note 4 above).

ANNEX II
TO
MARAD/USCG MOU ON RRP INSPECTION AND CERTIFICATION

GENERAL DEACTIVATION & MAINTENANCE PROCEDURES

1. Deactivation.

Vessels will be prepared for active retention in Phase III, initial deactivation, Phase V (Exercise/Activation) and Phase 0 (Operation), as follows:

a. Dehumidification systems capable of maintaining the relative humidity at 38% to 41% shall be installed to protect the following locations:

i. Engine room, steering gear spaces and workshop.
ii. Living quarters, navigation spaces, galley, and storerooms
iii. Motor generator control spaces.
iv. Any other spaces deemed appropriate by the parties concerned

b. A suitable cathodic protection system for the hull is to be provided.

c. Suitable Systems to detect fire and flooding, and sound an alarm are to be installed in the engine room, shaft alley and any other spaces considered appropriate.

d. The hull, decks, deck houses, machinery and equipment are to be lubricated, painted or otherwise preserved as required, to assure that they do not deteriorate during extended periods of inactivity and exposure to weather. Exterior openings, including uptakes, are to be covered or otherwise effectively sealed against weather.

e. Cargo gear including booms, blocks, runners, etc., are to be properly painted, preserved and stowed to minimize the harmful effects of non-use and exposure to the elements.

f. Plating in way of the last two frame spaces in the shaft alley including the tank top, bilge well and the after peak bulkhead up to the top of the stern tube is to be specially scaled and coated with an appropriate preservative.

2. Maintenance.

a. Preventative maintenance and repair procedures will be developed and employed during Phase IV (Maintenance) to ensure the systematic exercising, maintenance, inspection and testing of the various systems and equipment. Appropriate records of the maintenance, tests and inspections conducted shall be maintained by MARAD and the Ship Manager/General Agent.

b. The hull, deck houses and appurtenances shall be routinely inspected by MARAD or the Ship Manager/General Agent and maintained in a good state of preservation and appearance.

c. Cargo handling equipment shall be periodically operated by MARAD or the Ship Manager/General Agent to verify its readiness. The equipment shall be periodically re-preserved as required to maintain it in a good state of preservation.

d. Hatch covers shall be periodically inspected, operated and repaired as necessary to ensure a good state of preservation, weathertight integrity and operational status.

e. As part of the RRF Phase IV (Maintenance), each vessel shall be drydocked for examination by the USCG at intervals not to exceed five (5) or ten (10) years depending on the following:

i. Ten (10) year drydock interval - All RRF vessels which have had underwater bodies prepared and coated with a high build, high performance anti-corrosive and anti-fouling paint system in accordance with current MARAD specifications, and all zinc anodes renewed either at a routine drydocking or prior to entering the RRF, are eligible. Cathodic protection systems will be periodically serviced and maintained in operational order. At approximately five (5) years after the last drydocking, an underwater examination to determine the condition of the ve5sel below the waterline shall be carried out by a qualified diver using closed circuit television with two-way communication capable of being monitored by an inspector. The examination will be carried out generally in accordance with ABS's "Guide for Underwater Inspection in Lieu of Drydocking Survey."

ii. Five (5) year drydock interval - All RRF vessels which do not meet the ten (.10) year interval criteria. If a vessel is not properly prepared for a 10 year interval, as described in paragraph 2.e.i. above or is not otherwise eligible for the 10 year interval, and provided activation time does not exceed three years in 5, a vessel shall be drydocked at 5 year intervals.

f. Tailshaft surveys shall be carried out during this phase at the following intervals:

1. Ten (10) year interval - All RRF vessels which have undergone tailshaft surveys immediately prior to entering the RRF or during their lay-up in the RRF will be eligible subject to verification that the stern tube bearings and their lubricating oil systems, if so fitted$_1$ have been prepared for lay-up in accordance with MARAD's established procedures.

ii. For vessels not complying with the above whose tailshaft surveys exceed the normal Rule interval, the tailshaft surveys shall be carried out at the next drydocking survey.

g. Internal examination of a representative sample of structural fuel oil tanks shall not be conducted during Phase IV unless the USCG marine inspector determines by external examination that the condition of a tank may be unsatisfactory. Such routine examinations, if required, would be done after extended operation (Phase 0), and while the vessel is undergoing Phase V (Exercise/lay-up).

TO
MARAD/USCG MOU ON RRF INSPECTION AND CERTIFICATION

COP(AND. CONTROL & COMMUNICATIONS

1. Introduction.

Starting in August of 1990, 79 of the 96 vessels in the Ready Reserve Force were activated to provide sealift support for Operations DESERT SHIELD/STORM/SORTIE. These operations marked the first large scale activation of the RRF since its creation in 1976. Because of this, significant lessons were learned from these operations that had not been experienced in previous exercises and limited RRF activations. As in all complex operations involving inter-agency coordination, rapid and effective communications are essential.

Section VI of the USCG/MARAD basic MOU encourages cooperation and coordination between the OCMIs, MARAD and Ship Managers/General Agents. Preparation for future large scale activations of the RRF must include a system of rapid and effective communications between the agencies. In addition, the roles and responsibilities of the various decision makers within each organization should be defined and understood by both agencies. Advance preparation will ensure that information is transmitted directly to the correct destination as rapidly as possible.

This annex is intended to establish procedures which will ensure that communication is continuously maintained between USCG and MARAD decision makers to facilitate the inspection of the RRF. A glossary of key personnel and an outline of their organizational roles and responsibilities is included. The focus of this annex is on facilitation of USCG inspections of the RRF, but can be used to assist decision makers of both organizations at all levels on any marine safety subject requiring USCG/MARAD coordination.

2 Glossary of Organizational Titles.

a. MARAD

Below is an abbreviated list of MARAD titles and their common usage within the RRF Program.

i. Regional Director: The MARAD Regional Director administers all MARAD programs within his region, including the RRF program. The director is the regional representative for the Maritime Administrator.

ii. Ship Operations & Maintenance Officer: Is the primary point of contact in the Regional office for RRF vessel maintenance, repair, and activation contracts. Plans, submits and administrates budgets for vessel maintenance and repairs within the RRF program.

iii. Marine Surveyor: Responsible for one or more RRF ships to oversee vessel maintenance, repairs and activations. Works closely with Port Engineers and their respective Ship Managers/General Agents to ensure that vessels are kept in their assigned readiness status.

iv. General Agent: A ship operating company that represents MARAD for the maintenance and operation of RRF vessels by letter of agreement. Is empowered as MARAD's agent in all matters related to vessel maintenance, inspection, activation and operation.

v. Ship Manager: A ship management company that is contracted to represent MARAD for the maintenance and operation of RRF vessels. Is empowered as MARAD's agent in all matters related to vessel maintenance, inspection, activation and operation.

vi. Port Engineer: The "on site" representative of the General Agent or Ship Manager. Responsible for the daily operations required for the various Phases of RRF Management. Works closely with the Marine Surveyor during activations and inspections.

b. USCG

Below is an abbreviated list of USCG titles and their common usage within the Marine Inspection Program:

i. Commandant: In general, the use of the term "Commandant" denotes USCG Headquarters and the various staff elements who act on the basis of the Commandant's authority and documentation. G-MVI administers the inspection program for merchant vessels, including those in the RRF.

ii. District Commander: For marine inspection related issues within the boundaries of each geographic district, a staff officer designated as the Chief, Marine Safety Division acts on the basis of the USCG District Commander's authority. District Commanders are subordinate to the Commandant.

iii. Officer in Charge, Marine Inspection Designated and delegated to give immediate direction to marine safety functions including the inspection of vessels within their zone[2]. OCMIs are subordinate to the District Commander.

iv.. Marine Inspector: Either an officer or civilian federal employee of the USCG, designated by the OCMI to witness all required tests and inspections on board merchant vessels. The Marine Inspector is the primary individual in the field tasked with direct physical observation and initial evaluation of a particular vessel for compliance with vessel safety regulations. The marine inspector is subordinate to the OCMI.

For further information and more detailed descriptions, the USCG Marine Safety Organization and definitions of titles and functions are contained in Title 46, Code of Federal Regulations, Subchapter A. Subpart 1.01 of Subchapter A, "Organization and

[2] Certain OCMIs have been designated as having responsibility to conduct inspections of U.S. documented vessels as necessary outside of the United States, subject to reimbursement for travel and perdiem costs. The general distribution of overseas inspection areas is:

OCMI New York: Europe, Africa, Western Asia (Mid East)
OCMI New Orleans: Central and South America
OCMI Honolulu: Pacific Islands, Eastern Asia, Australia, India
OCMI Hampton Roads (Norfolk, VA): 3ritish Indian Ocean Territory (aka. Diego Garcia)

General Flow of Functions," contains a thorough list of organizational titles and corresponding functions pertinent to USCG inspection of merchant vessels. In addition to titles and organization, Subchapter A provides a useful description of the decision making flow within the Coast Guard Marine Safety Program. Various subchapters within Title 46 CFR also define organizational titles (e.g., 0CM I).

3 USCG/MARAD Organization

Figure 1 is intended to illustrate and provide a cross index of decision makers at various levels of both the USCG and MARAD.

Organizational Points of Contact:

a. Overview: As Figure 1 illustrates, the match between the USCG and MARAD does not directly correlate at all levels of decision making for RRF inspections and activations. At the headquarters level, interagency coordination is expedited by a USCG/MARAD liaison located at MARAD Headquarters. Below the Headquarters level the two organizations diverge in both geographic distribution and assignment of responsibility for completion of USCG inspections. MARAD currently has five Regional offices; the USCG has 10 districts, each with two or more OCMI zones. This results in all of the MARAD regional offices spanning several OCMI zones and at least two USCG District Commanders. Most OCMI inspection zones lie entirely within the boundaries of a single MARAD Region.

b. Inspection Scheduling and Conduct: OCMIs and XARAD Regions will coordinate scheduling of RRF vessel inspections and resolve deficiencies noted during inspections. As shown in the chart, MARAD Regional offices rely upon contract vessel operators for both the operation and maintenance of individual RRF vessels. To assist MARAD, and to facilitate inspections, OCMIs may deal directly with RRF vessel contract operators (Ship Managers/General Agents) during the course of an inspection. This does not relieve the MARAD Regional office from its responsibility to coordinate the inspection with the OCMI or to ensure that requirements are corrected. The following procedure shall be followed:

   i. Prior to commencement of an inspection, the MARAD Regional office shall contact the OCMI in whose zone an RRF vessel is to undergo inspection. MARAD will identify the Ship Manager/General Agent, their designated Port Engineer and the MARAD Representative who will be available to resp6n~ to inquiries and resolve inspection issues, when requested by the OCMI or the marine inspector.

   ii. As soon as possible after the commencement of any USCG inspection (i.e., COI, Drydock Exam, Cargo Gear, etc.) of an RRF vessel, a Marine Surveyor and the designated Port Engineer will visit the vessel and meet with the attending USCG Marine Inspector(s). They will agree on a schedule for maintaining contact with each other to discuss inspection issues. - USCG and MARAD will be readily accessible to each other throughout the course of the inspection or designate an alternative point of contact in the event of absence.

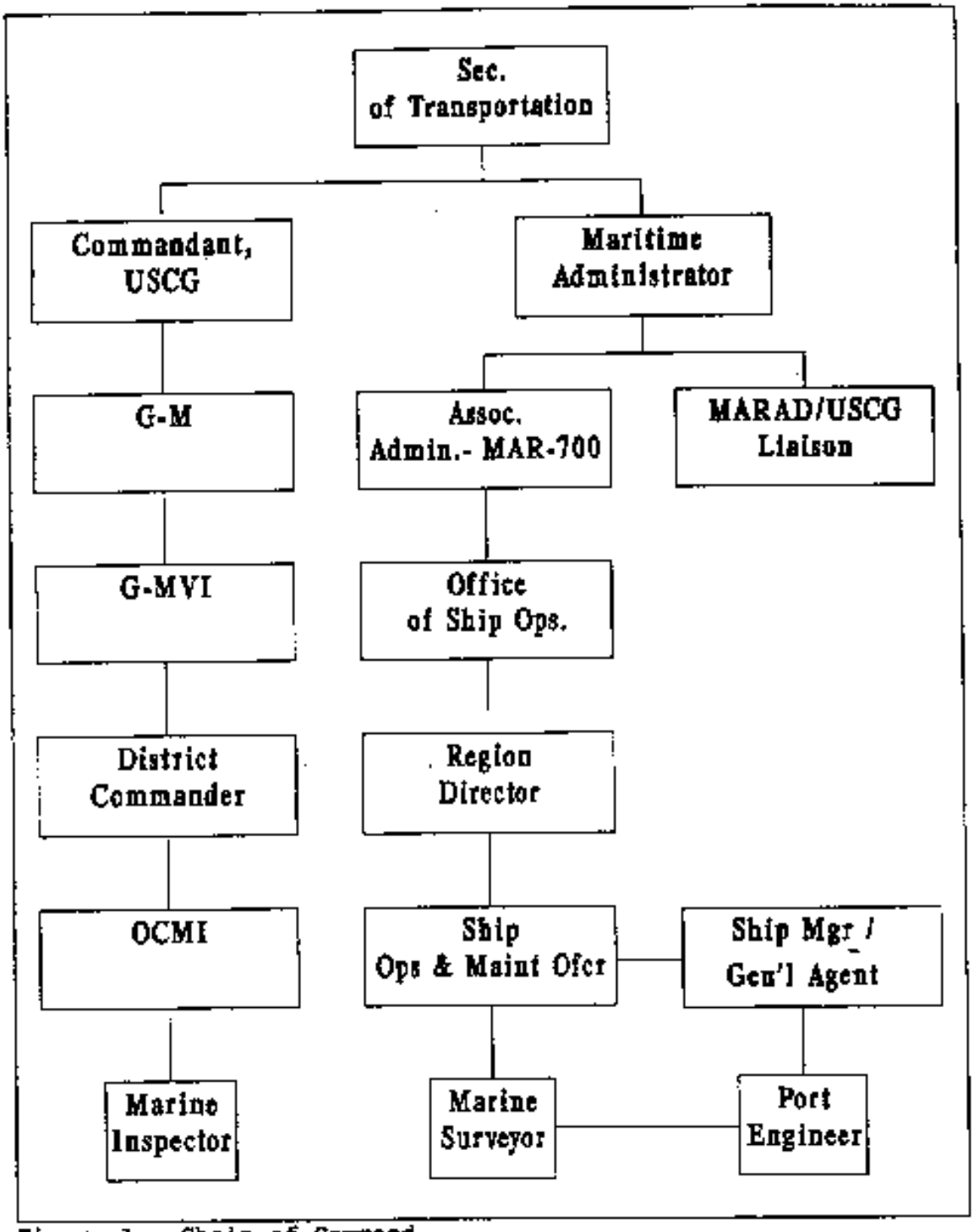

Figure 1 - Chain of Command

c. Coordination: When inspections involve multiple OCMIs, District Commanders or MARAD Regional offices, these individuals are encouraged to make direct contact with each other when coordination is required to resolve inspection issues involving an RRF vessel. This should occur as early as possible. For issues requiring headquarters level policy interpretation, or requiring a national defense waiver, either agency, at any level, may contact the USCG/MARAD liaison officer[3]. The liaison officer will assist by contacting the appropriate headquarters staff at each agency and coordinate a response to the issue/inquiry. Each agency will then be responsible for rapidly transmitting its decision to subordinate offices/commands involved.

[3] The USCG/MARAD Liaison (MAR-100.3) is located in the office of the Maritime Administrator, 400 7th Street 5.Washington, D.C. 20590, Telephone: FTS 366-1710, Commercial: (202) 366-1710, Telefax: (202) 366-3890.