

STCW Frequently Asked Questions: General Questions

1. Is there a public red-line version available that puts the changes in context?

At this time, the Coast Guard does not intend to provide a red-line version of the Final Rule to the docket. All of the changes in the Final Rule are being made to the Electronic Code of Federal Regulations (ECFR), which may be accessed [here](#).

2. (ADDED 02/14/14**) If a required STCW training course certificate, such as one for basic training, expires during the 5-year validity period of the MMC, does this invalidate the MMC?**

No, the MMC will not be invalid. The proof of compliance for basic training will be on the MMC in the form of an endorsement which will be placed at the time of issuance and renewal. The Coast Guard intends to implement the basic training continued professional competence requirements by: (1) requiring the course completion certificate as proof that the mariner demonstrated the areas that must be refreshed ashore; and (2) requiring 1 year of sea service in the last 5 years as proof that the seafarer demonstrated the topics that can be demonstrated onboard the vessel.

3. (ADDED 02/14/14**) Does the STCW Convention apply on the Great Lakes? Can mariners gain sea service credit toward an STCW endorsement with Great Lakes service?**

The STCW does not apply on Great Lakes waters. While the Coast Guard is now granting credit toward near-coastal and oceans endorsements for Great Lakes service, that does not mean that the STCW is applicable on the Great Lakes.

4. (ADDED 02/14/14**) Merchant Mariner Credential (MMC) validity. When a mariner receives a new MMC, does their old MMC become invalid if it has not expired yet? Can a mariner sail using the old MMC?**

46 CFR 10.205(d) states that an MMC becomes invalid when it is renewed or reissued before its expiration date. Because it is invalid, a mariner cannot sail using it. The exception to this is a transaction only for MMC renewal that occurs within 8 months of expiration. The renewed MMC will be post dated so the issue date coincides with the expiration date of the active credential held by the mariner. See 46 CFR 10.205(a).

5. **(**ADDED 02/14/14**)** The revised definition of “near-coastal” includes text which reads, “This would also include those near-coastal waters identified by another Administration when the U.S. has entered into a treaty or an agreement with that country respecting the recognition of the U.S. near-coastal endorsement.” May we interpret this to mean that no U.S.-flag vessel may operate outside U.S. waters using U.S. credentialed personnel holding only a near-coastal endorsement?

No. The U.S. has received acceptance of our near-coastal endorsements by some foreign Administrations. In those Administrations’ near-coastal waters, the U.S. near-coastal endorsements may be used in accordance with each Administration’s port state control procedures.

We do not have a definitive list of those countries/Administrations that consider the U.S. near-coastal endorsements as being acceptable for service in such foreign coastal jurisdictions. All of the current informal agreements/understandings precede the 2010 STCW Amendments. In the near future, we intend to reach out to relevant administrations to ascertain the status of such mariners.

6. **(**ADDED 02/14/14**)** With the revised definition of “near-coastal,” many companies operating offshore supply vessels (OSVs) in the waters of a foreign nation will be unable to staff their OSVs with masters holding an oceans endorsement, thus creating a labor supply shortage. Will the Coast Guard allow time for these mariners to obtain oceans endorsements so that they may continue their careers? This delay in implementation would also give the Coast Guard time to enter into a treaty or an agreement with multiple countries to allow continuance of the current practice of operating OSVs on another nation’s near-coastal waters using mariners with U.S. near-coastal endorsements.

The U.S. has received acceptance of our near-coastal endorsements by some foreign Administrations. In those Administrations’ near-coastal waters, the U.S. near-coastal endorsements may be used. The responsibility for enforcement of another Administration’s near-coastal waters lies within their port state control procedures.

We do not have a definitive list of those countries/Administrations that consider the U.S. near-coastal endorsements as being acceptable for service in such foreign coastal jurisdictions. All of the current informal agreements/understandings precede the 2010 STCW Amendments. In the near future, we intend to reach out to relevant administrations to ascertain the status of such mariners.

7. **(**ADDED 02/14/14**) Applicability of STCW Convention to barges.** On page 77817, column 2, of the Federal Register final rule, the USCG states “This change is necessary because these barges operate beyond the boundary line and are, consequently, subject to the STCW Code and Convention”. This would mean that barges are subject to STCW and the personnel serving on barges are required to have the appropriate STCW endorsements. This is not true. 46 CFR 15.1101(a)(1)(iii) clearly states that barges are exempt from the STCW Convention. Was the intent to state that service as a tankerman on a barge may be counted toward service time for an “advanced tanker operations” endorsement, but that this would not change the applicability of STCW for those serving on barges?

Yes, you are correct. 46 CFR 15.1101 states that barges are exempt from the application of the STCW Convention. The Coast Guard included provisions in this final rule to allow mariners serving on tank barges to qualify for STCW endorsements with a limitation to non-self propelled vessels.

The Coast Guard will accept service onboard some ATBs toward the national and STCW endorsements provided that the ATB/ITB equipment is equivalent to comparable tankship equipment.

8. **(**ADDED 02/14/14**) If someone has some sea service but no MMC, are they considered an existing mariner?**

Yes. Mariners who have service or training prior to 24 March 2014, will be considered as existing mariners for grandfathering purposes. See NVIC 02-14.

9. **(**ADDED 02/14/14**) STCW final rule availability.** When will the changes in the final rule be published in the on-line versions of 46 CFR Parts 10, 11, 13, 14 and 15?

The contents of Part 10, Subpart C, which has an effective date of 24 January 2014, have already been entered in the ECFR. Where there are new sections in the final rule, and in existing sections affected by the final rule, there is a link to the final rule in the Federal Register. While the ECFR is managed by another agency, we anticipate that all changes to the ECFR will be completed by 27 March 2014.

10. (ADDED 02/14/14**) STCW terminology. What is the difference between a revalidation course and a refresher course and what decides which one the mariner needs?**

Under the new renewal requirements for basic training, advanced firefighting, proficiency in survival craft, and fast rescue boats, the Coast Guard uses the term “revalidation” for the course for mariners who must show continued competence and have at least one year of service in the past five. “Refresher” is used for the courses for mariners who do not have the 1 year of service in the past 5 years.

11. (ADDED 02/14/14**) MMC renewals. How will I provide “evidence of maintaining the standard of competence in advanced firefighting for renewal as described in 46 CFR 11.303(b)”?**

In order to meet the renewal requirements of advanced firefighting after 31 December 2016, you must satisfy the requirements of 46 CFR 11.303(c) and (d). 46 CFR 11.303(c) states that the Coast Guard will accept onboard training and experience, through evidence of 1 year of sea service within the last 5 years, as meeting certain listed requirements of the STCW Code. 46 CFR 13.303(d) and NVIC 09-14 list those areas of the STCW Code for which the Coast Guard will only accept evidence of assessments conducted ashore as meeting the requirements of paragraph (b).

12. (ADDED 02/14/14**) Is there a list of the 26 NVICs and their topics somewhere?**

You may find information on the NVICS [here](#). The Coast Guard intends to publish additional NVICs that provide assessments for deck and engineer endorsements at the management, operational, and support levels. Additionally, we will provide guidance for the following specialized areas: towing vessels; high speed craft; qualified assessor; security endorsements; tank vessels; and recognition of foreign certificates.

13. (ADDED 02/14/14**) Radar observer. Are all deck officers required to maintain radar observer endorsements?**

46 CFR 15.815 requires that all deck officers serving on vessels of 300 GRT or more and uninspected towing vessels which are equipped with radar must have a radar observer endorsement.

14. (ADDED 03/24/14**) Since the U.S. and Canada have an agreement respecting mutual recognition of national mariner qualifications, are mariners sailing between the U.S. and Canada only required domestic (national) endorsements on their merchant mariner credentials (MMCs)?**

Yes, the Memorandum of Understanding between the U.S. and Canada states that “...vessels trading between the United States and Canada will abide by the legislation for domestic (home-trade) voyages, of the nation in which they are registered while engaged in cross border trade...” Therefore, mariners sailing between the U.S. and Canada are only required to have domestic (national) endorsements on their MMCs, unless elsewhere required in the regulations.

15. (ADDED 07/07/14**) Awaiting Information (AI) letters: If a mariner submits an application prior to 24 March 2014 with a prerequisite missing for an officer endorsement, will he or she be issued an AI letter valid for 90 days as was done before the final rule?**

Yes, the final rule made no changes to 46 CFR 10.209(b). The Coast Guard may refuse to process an incomplete application; however, the Coast Guard intends to continue the practice of sending an AI letter valid for 90 days. Should the mariner be unable to satisfy the deficiencies noted in the AI letter, an extension may be requested.

16. (ADDED 07/07/14**) Awaiting Information (AI) letters: If a mariner has an AI letter issued prior to 24 March 2014 and requests an extension of the 90 days validity period, will he or she be granted one assuming that it meets the normal criteria for an extension request?**

Yes, there are no changes to the extension request process or NMC criteria for granting extensions to AI letters.

17. (ADDED 07/07/14**) Applicability: Does the STCW Convention apply to all seagoing vessels operating beyond the boundary line when engaged on international voyages? Are any vessels exempted from inclusion? What about those mariners with an endorsement as operator of uninspected passenger vessels (UPV) near-coastal 100 miles offshore, or as master 100 GRT up to 200 miles offshore who operate beyond the boundary line?**

The STCW Convention applies to all seagoing vessels as defined in 46 CFR 10.107, except those exempted by 46 CFR 15.105(f) and 46 CFR 15.1101(a)(1). Mariners serving on uninspected passenger vessels and small passenger vessels of not more than 100 GRT on an international voyage must meet the requirements of the STCW Convention, including holding both national and STCW endorsements as master or mate on a vessel of appropriate tonnage. However, 46 CFR 15.105(g) exempts mariners sailing on small vessels engaged on domestic near-coastal voyages from the requirements of the STCW Convention.

18. (ADDED 07/07/14**) Tonnages: Will the Coast Guard start using ITC instead of GRT?**

Yes. Beginning on 24 March 2014, the Coast Guard will begin using only ITC for STCW endorsements.

19. (ADDED 07/07/14**) Qualified Assessors: I've been searching for and not finding information on who can conduct onboard assessments for mariners. Is there a minimum license, STCW endorsement required to sign off on a mariner's assessments? Is there a policy document that you could refer me to?**

The Coast Guard developed NVIC 19-14 to provide guidance for qualified assessors and the assessment of STCW proficiencies. During the transitional period, those mariners currently allowed to complete assessments may continue to do so until 31 December 2016. The assessors must be in possession of the level of endorsement, or other professional credential, which provides proof that he or she has attained a level of experience and qualification equal or superior to the relevant level of knowledge, skills, and abilities to be assessed. For support and operational level assessments, the Coast Guard will generally accept an OICNW/EW with one year service as meeting this requirement.

20. (ADDED 07/07/14**) Applicability: Are all vessels greater than 200 gross register tons (GRT) subject to STCW even if they are less than 500 gross tonnage as measured under the International Tonnage Convention (ITC)?**

Yes, STCW is applicable to all vessels operating seaward of the boundary line; however, vessels less than 200 GRT on domestic, near-coastal voyages are not subject to any obligations for the purposes of the STCW Convention. (See 46 CFR 15.105 and 15.1101.)

21. (ADDED 07/07/14**) Applicability: Is a vessel of more than 200 GRT, with a Certificate of Documentation listing its registry as coastwise, subject to the STCW Convention while operating in inland waters?**

STCW is not applicable to a vessel if operating inside the boundary line.

22. (ADDED 07/07/14**) Application requirements: What has changed in the new regulations with regard to the oath and character references?**

The requirement for an applicant to submit letters of reference in the application package has been removed in these regulations. The requirement to take an oath still exists and was not changed in the new regulations.

23. (ADDED 07/07/14**) Do the requirements for an ECDIS endorsement apply to mariners serving on vessels to which STCW does not apply?**

No. ECDIS training and the associated endorsement are not required on vessels to which STCW does not apply. However, each crewmember must be familiar with the relevant characteristics of their vessel, including the proper operation of installed navigation equipment, as specified in 46 CFR 15.405.

24. (ADDED 07/07/14**) STCW endorsement renewal: I have maintained my national endorsement but have not renewed my STCW endorsement. How would I re-activate my STCW endorsement once it has expired beyond the grace period?**

You can re-activate your STCW endorsement by completing the gap closing requirements for your STCW endorsement as well as meeting the basic training requirements (46 CFR 11.302(e) or 12.602(e)).

25. (ADDED 07/07/14**) Do I need a quality standard system and if so, where do I find the requirements or guidelines for the manual?**

46 CFR 10.410 provides the requirements of a quality standards system for approved or accepted training on subjects required for STCW endorsements.

26. (ADDED 07/07/14**) Qualified assessors: Do course providers need to resubmit the resumes for their approved instructors to be qualified assessors?**

No. Approved instructors may conduct all assessments within the course(s) they are approved to instruct without further approval. However, if an instructor desires to be approved to conduct any other assessments, he or she will need to meet the qualification requirements for a qualified assessor.

27. (ADDED 07/07/14**) MMC officer endorsement eligibility: How can a mariner who is not a U.S. citizen convert his or her license issued by another Administration to a U.S. credential?**

Under the authority of Title 46 U.S. Code 7102, 46 CFR 10.221(a)(1), only individuals with valid U.S. citizenship may apply for officer endorsements, with the exception of individuals applying for endorsements as operators of uninspected passenger vessels which will be limited to service on undocumented vessels.

28. (ADDED 07/07/14**) Must a mariner hold a national endorsement in order to qualify for an STCW endorsement?**

Yes, 46 CFR 11.201(a) specifies that an applicant for any STCW endorsement must hold the appropriate national endorsement unless otherwise specified.

29. (ADDED 07/07/14**) 46 CFR 12.201(a)(1) states that all officer MMCs will be issued with entry-level ratings endorsed on them. From a legal standpoint this is wrong, because if an OUPV's MMC has ratings endorsements on it, this will allow the holder to work on vessels over 100 GRT, which would require that he or she keep their TWIC valid (per 46 CFR 10.203). Essentially the new 12.201(a)(1) voids the TWIC exemption policy issued in CG-543 Policy Letter No. 11-15 dated 19 December 2011.**

CG-543 policy letter 11-15 remains in effect. The policy letter exempts mariners without a valid TWIC who operate onboard vessels without a security plan from having to renew their TWIC. This includes uninspected passenger vessels of less than 100 GRT. Per the policy letter, a mariner holding or renewing one of these endorsements, and who previously held a TWIC, should include a written statement that they do not require a TWIC with their application. For more specific detail see CG-543 Policy Letter 11-15 found on the NMC website.

30. (ADDED 07/07/14**) If I renew my STCW endorsement before January 1, 2017, how long is my course completion certificate for the following approved training valid for:**

(a) leadership and managerial skills?

(b) electrical and electronic control equipment [46 CFR 11.325 (b) (3)]?

(c) engine resource management [46 CFR 11.325(b)(1)]?

The course completion certificates for these three courses are valid for 5 years. See NVIC 03-14, paragraph 5.a.

31. (ADDED 07/07/14**) Included endorsements on management level MMCs: My MMC currently has STCW and national endorsements as Chief Engineer of steam and motor propelled vessels. On my next renewal, will the STCW endorsements of OICEW, RFPEW, BT, Advanced firefighting, Proficiency in Survival Craft, and other endorsements be included automatically if I provide the appropriate sea service?**

Yes, MMCs are now being endorsed with all STCW endorsements for which the mariner is qualified. Until December 31, 2016, these endorsements will be automatically included at renewal if you have 12 months of sea service in the last five years. After that date, mariners must demonstrate continued competence through the appropriate combination of sea service and training. In addition, in order for your Chief Engineer STCW endorsement to be valid after December 31, 2016, you will need to complete training in leadership and managerial skills, engine resource management, and management of electrical and electronic control equipment.

32. (ADDED 05/27/15**) Why were new regulations applying to mariners on the Western Rivers hidden in the new STCW regulations? Since STCW doesn't apply to mariners on the Western Rivers, we don't read STCW proposals. Since these regulations were proposed in an area of regulations that don't apply, we were effectively denied an opportunity to comment on the proposed regulations.**

You were not denied an opportunity to comment on the proposed regulations. The Coast Guard published a Supplemental Notice of Proposed Rulemaking (SNPRM) on August 1, 2011, titled, "Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Changes to Domestic Endorsements." The Coast Guard also issued a Press Release announcing the publication of the SNPRM. The public was given 60 days to comment on the proposed rulemaking. In addition, the Coast Guard held four public meetings, announced in the Federal Register, to discuss these regulations. All comments received from the public to the Federal Register docket and from members of the public at the four public meetings were considered in the promulgation of these final regulations. It should be noted that comments from the public were received concerning domestic endorsements.

33. (ADDED 05/27/15**) What is the difference between a refresher training course and a revalidation course?**

A revalidation course is for those mariners who have 1 year of service in the past 5 years (see 46 CFR 13.201(d)), whereas a refresher training course is for those who cannot meet the requirement for 1 year of sea service within the last 5 years. This latter group of mariners will be required to complete approved or accepted refresher training or meet the requirements of 46 CFR 13.302(a) (see 46 CFR 11.302(e)).

34. (ADDED 05/27/15**) For officers who elect to have their assessments signed off aboard ships instead of attending the approved upgrade courses, there are several places that indicate "COURSE" either in the assessment guidelines or in the assessment record. Does this indicate that the assessments cannot be done aboard and that a course must be taken?**

Yes, in every instance where a "COURSE" is noted in the assessment guidelines or assessment record, there is a required course for the endorsement that must include training and assessment relevant to the noted assessment.

35. (ADDED 05/27/15**) Do shipboard assessors need any special qualifications beyond those listed in Policy Letter 04-02: i.e., they must possess the license and STCW management level endorsement, read the Conducting Mariner Assessments publication, read the guidance in Policy Letter 04-02, and be sailing aboard the vessel with the mariner to be assessed?**

Those individuals conducting assessments before January 1, 2017, need only meet the requirements in NVIC 04-02. However, qualified assessors (QAs) after that date must be approved by the Coast Guard. Information on QAs is contained in NVIC 19-14, "Policy on Qualified Assessors." Information concerning the transition to Coast Guard approved QAs is also contained in the introductory text of Enclosure (2) to NVIC 10-14, and in other NVICs that include model assessments.

36. (ADDED 05/27/15**) Do assessments expire? Is there a time limit from when the assessments sign off begin to when they have to be complete or apply to take the upgrade exam?**

There is no time limit or expiration on shipboard assessments. However, if assessments have changed, the applicant would be required to meet the new assessments unless otherwise grandfathered. The Coast Guard will accept assessments from the outdated policy up to 6 months following their revision.

37. (ADDED 05/27/15**) Hours of rest: With regard to 46 CFR 15.1111(a), as long as a mariner has 77 hours of rest in a 7 day period, does he or she still have to have 10 hours of rest in a 24 hour period?**

Yes, both requirements must be met. However, in exceptional circumstances, the master of the vessel may authorize exceptions from these requirements. See 46 CFR 15.1111(j).

38. (ADDED 05/27/15**) Under the 2010 Amendments to the STCW Convention, are there any requirements for a mariner serving in the engine department to have any type of EPA certification? Type I, II, III or Universal?**

Under the Manila Amendments, there are no requirements for these endorsements. Additionally, under U.S. credentialing regulations, these certifications are not included.

39. (ADDED 05/27/15**) Alternative methods of proving competence: I have some concerns with the new assessments for NVICs on able seafarer-deck and some OICNW assessments. Some of those assessments stipulate that they can be done only on a vessel. Yet some vessels like OSVs and drill ships do not have the ability to conduct the assessment even if an approved assessor is onboard. Has the Coast Guard made allowances to solve these issues? I recommend that schools with the appropriate mockup be allowed to conduct assessments for those vessels that are unable to comply with the respective NVICs.**

In the final rule, the Coast Guard has taken a balanced approach to training requirements. These regulations specify those areas where “approved training” is required. In some instances, the regulations do not specify the type of approved training: classroom, training ship, e-learning, etc. In these cases, it is up to the industry, including training institutions, to submit their training for approval.

Additionally, your concerns have been forwarded to the MMCPolicy@uscg.mil for consideration in future revisions of the NVIC.

40. (ADDED 05/27/15**) ECDIS and ARPA Endorsements: Please provide clarification of the negative ECDIS & ARPA endorsements on the MMC. This is needed to clear up misunderstanding among Officer Unions, shipping companies and Masters believing that an endorsement of the ECDIS & ARPA are required to be in the MMC before joining an vessel.**

The regulations published on December 24, 2013, provide for endorsements consistent with the STCW Convention, which provides for a limitation for those officers who have not met the requirements for ARPA and ECDIS. As such, the limitation is more appropriate since it will be the exception to the rule.

41. (ADDED 05/27/15**) It is our understanding that in accordance with the regulations that only vessels over 100 GRT currently require a Merchant Marine Credential for unlicensed personnel, but at the same time the regulations state that STCW applies to vessels over 500 GT and that an applicant for any STCW endorsement must hold the appropriate national endorsement. Will all crew serving on a US flagged passenger vessel less than 100 GRT but more than 500 GT on an International Voyage be required to carry a U.S. Coast Guard-issued Merchant Mariner Credential (MMC)?**

As noted in 46 CFR 15.1101(a) – small passenger vessels subject to subchapters T or K are not subject to STCW when they are on a domestic voyages. Per 46 CFR 15.1101(b), the Coast Guard will provide an STCW endorsement for a single voyage of a non-routine nature. If routinely on international voyages, STCW endorsements would be required.

42. (ADDED 05/27/15**) For small passenger vessels routinely operating on international voyages, will a Deckhand need an endorsement as an “Ordinary Seaman” or “AB Limited” to qualify for an STCW endorsement as a “RFPNW” and a Rating as a “Wiper” to qualify for an STCW endorsement as a “RFPEW”? And will the Hotel Department be required “Steward (F.H.)” endorsements if they are listed on the safety billet? If not, will certificates of course approved course completion attached to the crewman’s company issued training record suffice? If not, will crew still be required to have a yearly physical and be issued a Medical Certificate?**

Those mariners serving in a watchstanding positions would be required to hold an endorsement as OS and RFPNW or wiper and RFPEW. There is no requirement to hold an endorsement as stewards department (food handler) on small passenger vessels. Additionally, those persons serving in safety and environmental protection positions would require basic training. This training will either be documented as an endorsement on a credential or if no credential is issued the vessel will need to carry the documentary evidence. Mariners must also meet the security requirements in 46 CFR 15.1113. These requirements will either be documented as an endorsement on a credential or if no credential is issued the vessel will need to carry the documentary evidence.

Finally, a credentialed mariner must hold a medical certificate as identified in 46 CFR 10.302.

43. (ADDED 05/27/15**) Will the requirement of the MMC trigger TWIC requirements for positions that would not normally require them of a domestic voyage? (Note: TWIC is a U.S. Regulation only and not required by foreign flag state.)**

Mariners serving on an international voyage are required to hold a TWIC per 33 CFR 101.514.

44. (ADDED 05/27/15**) Near-coastal Voyages: With the change in the definition of “Near-Coastal voyage,” will Masters and Mates on international voyages be required to have Ocean Endorsements if a Near Coastal endorsement is not recognized by the foreign flag state?**

If a foreign administration does not have near coastal waters, or does not accept the U.S. near coastal endorsements, a mariner sailing in that administration’s waters must hold an endorsement authorizing ocean service.

45. (ADDED 05/27/15**) The revised definition of “near-coastal” includes text which reads: “This would also include those near-coastal waters identified by another administration when the U.S. has entered into a treaty or an agreement with that country respecting the recognition of the U.S. near-coastal endorsement.” May we interpret this to mean that no U.S.-flag vessel may operate outside U.S. waters using U.S. credentialed personnel holding only a near-coastal endorsement?**

No, that would not be an appropriate determination; however, the United States will need to be aware of those near coastal waters of another administration in which U.S. vessels choose to operate. These administrations may not have designated near coastal waters or may not encompass the same distance from shore as the U.S. has from our shore.

46. (ADDED 05/27/15**) Does the signature of a QA obtained prior to December 31, 2016, become null and void after that date if the student has not completed all requirements and submitted their application to NMC?**

In order to allow the applicant time to complete all of his or her assessments in a timely fashion and still receive credit for assessments completed by non-approved QAs before January 1, 2017, the Coast Guard will accept those assessments until June 30, 2017. All assessments completed on or after January 1, 2017, must be signed by an approved QA.

47. (ADDED 05/27/15**) STCW applicability: Do the STCW regulations apply to port relief engineers and day maintenance engineers? These mariners are reliefs dispatched out of the union hall, usually for 8-hour shifts, but on occasion it could be a lot longer. However, the jobs never last more than 40 hours.**

No. The STCW regulations apply to mariners working on vessels which are operating beyond the boundary line of the United States. However, the owner or operator of a particular vessel may impose additional requirements.

48. (ADDED 07/22/15**) USCG Approved Towing Vessel Designated Examiners, qualified and approved for Oceans/Near Coastal TOARs and required to hold STCW endorsements for vessels under 200 GRT on foreign voyages or vessels over 200 GRT on domestic coastwise/foreign voyages, do not receive any recognition for approval as Qualified Assessors. They ALL have to reapply!**

It has been fine that these mariners have been completing TOAR competencies and onboard STCW competency sheets prior to 03/24/2014 for RFPNW or OICNW while maintaining the highest order of marine safety in training. But now they have to reapply to become a QA or stop assessing STCW competencies after 12/31/16.

What has changed in their skill sets that causes them to have to reapply to perform a task that they have been performing for both towing vessel officer candidates and those (some of whom are the same individuals) seeking STCW endorsements prior to 03/24/14?

As a compromise, I would suggest grandfathering current Oceans/ Near Coastal designated Examiners to Qualified Assessors for vessels "500 GT or more and less than 3,000 GT Management Level or operational level - 46 CFR 11.311, 11.309".

This is the new STCW endorsement level required for Towing Vessel Masters required to meet STCW Code.

A designated examiner, in order to become a qualified assessor after December 31, 2016, must be approved by the Coast Guard after demonstrating they meet the qualification requirements. This is consistent with the regulations published in 46 CFR 10.405. The designated examiners will likely meet the requirements for qualified assessors; however, they will need to be evaluated whether they meet the requirements to conduct STCW assessments.

For more information regarding obtaining approval as a qualified assessor, see NVIC 19-14.

49. (**ADDED 09/15/15**) STCW Requirements for Uninspected Passenger Vessels. I am writing to inquire about the STCW code pertaining to Uninspected Passenger Vessels.

I have found your Navigation and Vessel Inspection Circular 08-14. Does this apply to Uninspected Passenger Vessels (UPVs)? I am a captain of a pleasure yacht which charters with a maximum of six paying passengers. I am trying to figure out the STCW Basic Training requirements for this vessel.

The STCW Convention applies to all seagoing vessels as defined in 46 CFR 10.107, except those exempted by 46 CFR 15.105(f) and 46 CFR 15.1101(a)(1). Mariners serving on UPVs and small passenger vessels of not more than 100 GRT on an **international** voyage must meet the requirements of the STCW Convention, as implemented with the U.S. regulations, including holding both national and STCW endorsements as master or mate on a vessel of appropriate tonnage. However, 46 CFR 15.105(g) considers mariners sailing on small vessels engaged **exclusively on domestic near-coastal** voyages compliant with the manning requirements for vessels subject to the STCW Convention.

Individuals holding an endorsement as Operator of Uninspected Passenger Vessels are not authorized to operate UPVs on an **international voyage**, see 46 CFR 11.467 (b).