

STCW Frequently Asked Questions: General Sea Service

- 1. 46 CFR 11.401 (e)(3) reads, “Service on vessels to which STCW applies, whether inland or coastwise, will be credited on a day-for-day basis.” Some people might interpret the phrase “day for day” as meaning a person will be credited with only one day of service for each day served, but the definition of a day in 46 CFR 10.107 allows for 1½ days of credit for 12-hour days when the vessel is authorized to work that schedule. Would you please confirm that the provision in 11.401 (e)(3) does not override the definition in 10.107?**

The provisions in 46 CFR 11.403(e)(3) do not override the definition of “day” in 46 CFR 10.107. On vessels authorized by 46 U.S.C. 8104 and 46 CFR 15.705, to operate a two-watch system, a 12-hour working day may be creditable as 1½ days of service. This is also discussed in 46 CFR 10.232(h)(2).

- 2. Liftboat sea time. Can you provide information on where the USCG is with regard to the National Offshore Safety Advisory Committee’s (NOSAC)/Industries’ claims of unfair treatment of U.S. mariners under Policy Letter 09-01? NOSAC and the industry came together and produced information given to the Coast Guard concerning this issue, and after a couple of months, there has been no response from the Coast Guard.**

We have generally incorporated Policy Letter 09-01 into the requirements found in 46 CFR 10.232(e). The Coast Guard received input from NOSAC in November 2013 concerning NMC Policy Letter 09-01, regarding liftboat sea service credit calculations. In consideration of the input from NOSAC, the Coast Guard will conduct an evaluation of vessel operations and determine whether additional sea service credit should be granted to mariners serving on liftboats.

- 3. (**ADDED 02/14/14**) With regard to sea service letters required by 46 CFR 10.232(a), what evidence will the Coast Guard accept to document sea service? Who must sign these letters?**

Sea service letters or other official documents from marine companies may be signed by the owner, operator, master, chief engineer of the vessel or other senior company official defined in 46 CFR 10.107. The Coast Guard must be satisfied as to the authenticity and acceptability of all evidence of experience or training presented.

4. **(**ADDED 02/14/14**)** If a mariner holds an MMC and is assigned to a non-marine position on a vessel that is not required to be filled by a credentialed mariner, can that employee accrue sea service while in this non-marine position?

Generally speaking, no. The various endorsements require a specified period of sea service in the deck (or engine) department of a vessel. Sea service is defined in 46 CFR 10.107 as “Service onboard a ship/vessel relevant to the issue of a credential or other qualification.” However if the service meets the specific requirements for the endorsement sought, it could be considered “closely related service” under 10.232(g). The Coast Guard will also continue to accept some military service as specified in 10.232(d).

5. **(**ADDED 02/14/14**)** Tonnage requirements. What is the final rule referring to when it says “Examples include the lowering of the minimum tonnage and expanding the acceptance of towing service towards unlimited deck endorsements?” Will this lower the tonnage requirement for advancing my 3rd mate unlimited endorsement? I currently work on a 2,998 GT (ITC) offshore supply vessel and I’m seeking a 2nd mate unlimited endorsement. Currently the ITC requirement for unlimited seetime is 3,000 GT (ITC). Will this change?

46 CFR 10.232(i) states that, for Parts 10, 11, and 12, 1,600 GRT will be considered equivalent to 3,000 GT (ITC). Because the vessel the mariner served on is less than 3,000 GT (ITC), service earned cannot be used to meet the requirement for service on vessels over 1,600 GRT. This mariner would be eligible for 3rd mate with a tonnage limit calculated using 46 CFR 11.402.

6. **(**ADDED 02/14/14**)** Tonnage restrictions. Enclosure (1) to NVIC 02-14, states that “Under 46 CFR 11.402(a)(1), beginning 24 March 2014, applicants for master or mate of unlimited tonnage may obtain service on vessels of 100 GRT or more instead of 200 GRT as required in the rules in effect prior to 24 March 2014. Service earned prior to 24 March 2014, will be credited if it was on vessels over 100 GRT”. Will I be able to remove the tonnage restriction from my 2nd mate (limited tonnage) because of my previous experience (all previous experience is over 100 GRT domestic)? I believe the previous rule was that I had to have 6 months of experience over 1,600 GRT to get my tonnage restriction removed.

No, 11.402(c), which discusses how a mariner may have a tonnage restriction raised or removed, requires 6 months of service on vessels of 1,600 GRT or more in the highest grade endorsed in order to have all tonnage limitations removed.

7. **(**ADDED 03/24/14**) Is service on a vessel operating on the Inside Passage between Puget Sound and Cape Spencer, Alaska creditable towards the able seamen-unlimited rating?**

Yes. Although 46 CFR 10.107 explicitly excludes the waters of the Inside Passage between Puget Sound and Cape Spencer from the definition of “oceans”, 46 CFR 10.232(b)(3) provides specific service credit toward a near coastal or STCW endorsement.

8. **(**ADDED 03/24/14**) Is service aboard all vessels operating between Puget Sound and Cape Spencer, Alaska, credited towards near-coastal and STCW endorsements?**

Yes. 46 CFR 10.232(b)(3) states, for establishing credit for sea service, the waters of the Inside Passage between Puget Sound and Cape Spencer, Alaska, will be credited for near-coastal and STCW endorsements.

9. **(**ADDED 03/24/14**) Is a vessel that operates exclusively on the Inside Passage between Puget Sound and Cape Spencer, considered a “seagoing vessel” if it crosses the boundary line between the U.S. and Canada?**

Yes. 46 CFR 10.107 defines “seagoing vessel” as a ship that operates beyond the boundary line specified in 46 CFR Part 7. The boundary line for this question would be found in 46 CFR 7.150.

10. (ADDED 07/07/14**) 46 CFR 11.301(g)(3) says that “candidates who apply for a credential based on ... approved seagoing service that was completed before 24 March 2014, may qualify under the requirements of this part existing before that date.” Would this paragraph preclude the mariner from applying under the newer regulations, regulations that appear to regard the “inside passage” as near coastal? What if I already have an application that was evaluated before 24 March 2014?**

Considering that the new provisions in 46 CFR 10.232(b)(3) for inside passage service will benefit all mariners, we will immediately apply them to all mariners without regard to whether they are being evaluated under the new rule, or under grandfathering provisions allowing mariners to qualify under the old rules. Accordingly, service on the inside passage may be used to qualify for a near coastal endorsement even if the mariner is eligible for “grandfathering” and is evaluated under the rules in place before 24 March 2014. Mariners with current open applications at the NMC with information pending (letter has been sent to the mariner prior to 24 March 2014 may contact the NMC and request to be evaluated again under these new regulations. The NMC will pull the application and re-evaluate it. If the application has been closed, either timed out or a credential issued, a new complete application must be submitted. The NMC will not re-open those files.

11. (**ADDED 05/27/15**) In the Rating Forming Part of the Navigational Watch (RFPNW) NVIC, Enclosure 1 paragraph 2.c., it says: “For qualification as an RFPNW, a day of approved seagoing service is eight hours associated with navigational watchkeeping functions that involve the performance of duties carried out under the direct supervision of a qualified deck officer or a qualified rating (STCW Regulation II/4). As an alternative to eight hours in one day, two periods from two different calendar days, each not less than four hours, will be credited as one day of sea service. When two such periods are combined as a single day of sea service, no additional credit is given for periods served over eight hours total (46 CFR 10.107).” This seems to conflict with the definition of “day” in 46 CFR 10.107, which says, in part, “On vessels authorized by 46 U.S.C. 8104 and 46 CFR 15.705, to operate a two-watch system, a 12-hour working day may be creditable as 1 1/2 days of service.” Am I correct in believing that the NVIC text is not trying to contradict 46 CFR 10.107 and that a mariner on an OSV or tug would get 1 1/2 days of sea service credit for working 12 hours in a day on a vessel with a legal two-watch system?

Yes, you are correct in that the provisions in enclosure (1), paragraph 2.c. of NVIC 06-14 do not override the definition of “day” in 46 CFR 10.107. On vessels authorized by 46 U.S.C. 8104 and 46 CFR 15.705, to operate a two-watch system, a 12-hour working day may be credited as 1 1/2 days of service. This is also discussed in 46 CFR 10.232(h)(2), where it says, “On vessels authorized by 46 U.S.C. 8104 and 46 CFR 15.705, to operate a two-watch system, a 12-hour working day may be creditable as 1 1/2 days of service.”

12. (**ADDED 05/27/15**) Unlimited tonnage endorsements: If a vessel is admeasured under ITC tonnage only and it exceeds 1600 GT (ITC), will this tonnage qualify the mariner for an unlimited tonnage endorsement?

Yes. Service on a vessel of 1600 GT (ITC) or more solely admeasured under the international tonnage scheme will be used in 46 CFR Parts 11 and 12 with no conversion.

13. (**ADDED 05/27/15**) ATB/ITB Service Credit: I have ~3 years sea time on Crowley's ocean going ATB's. The tug is 963 ITC and the barge is 11,457 (265 / 9,810 GRT). I was able to upgrade from my 3rd mate unlimited oceans two years ago to a 1,600 ton master oceans, but I had to re-test. Now I'm wondering what my outlook is to improve my current officer endorsement.

The regulations published on December 24, 2013, grants credit for service on towing vessels using the aggregate tonnage on a two-for-one basis (2 days experience equals 1 day of creditable service) for up to 50 percent of the total service on vessels of 1600 GRT or more. See 46 CFR 11.211(d) and (e).

Service on ATBs does not receive the same service credit as that on ITBs since ATBs are not required to meet the same construction, outfitting, and manning requirements as ITBs. ITBs are required to meet the same standards as conventional vessels of similar tonnage.

14. (**ADDED 05/27/15**) Will my military qualifications be accepted to meet the requirements for an STCW endorsement or will I have to complete the required assessments? And who may sign the STCW assessments on my military vessel?

For military service the Coast Guard will recognize the professional training, if it is approved by the Coast Guard for the endorsement. If the training is not approved, the mariner will need to complete the assessments required for the endorsement. The Coast Guard recognizes that the military services already approve personnel to conduct assessments and will recognize those individuals as assessors for completion of STCW assessments. Such training can be recognized as being retroactively approved, if the service seeks such recognition for the training.

15. (**ADDED 05/27/15**) I am a licensed engineer and I work at sea, as well as dockside, in a full-time position. My interpretation of the phrase "sea service" is that each day I work, at sea or dockside on an operational vessel, using the engineering skills necessary, will be credited as a day of service. Can you please verify that this is the correct interpretation of this phrase?

"Seagoing service" is defined as "service onboard a ship/vessel relevant to the issue of a credential or other qualification." Usually, this service includes time that the vessel is both in port and underway engaged in its normal operational routine. For detailed explanations and major exceptions see 46 CFR 10.232.