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## 12 Hour Day / Time-and-a-Half Credit

### Definition of “Day”

According to [46 Code of Federal Regulations \(CFR\) 10.107\(b\)](#), “Day” means “for the purpose of complying with the service requirements of this subchapter, eight hours of watchstanding or day-working, not to include overtime”. On vessels authorized by [United States Code \(USC\) 8104](#) and [46 CFR 15.705](#), to operate a two-man watch system, a 12-hour working day may be creditable as time-and-a-half day of service.

- In order to be credited with time-and-a-half credit, service must be authorized and practiced on a vessel that has a six-on, six-off watch system.
- The Marine Safety Manual ([MSM Vol. III, Chapter 2.G](#)) states the following: “The time-and-one-half provision was put in the regulations to take into account the additional experience mariners obtain when they stand watches on a six-on, six-off watch schedule.”
- Time-and-one-half credit will not be given for overtime or for other work days that do not involve six-on, six-off watchstanding, even if the work days are more than eight hours long. Exceptions are noted below.

### Exceptions

On vessels of less than 100 gross registered tons (GRT), a day is considered as eight hours unless the Coast Guard determines the vessel's operating schedule makes this criteria inappropriate, in no case will this period be less than four hours.

- If an employer sea service letter or small vessel sea service form that states a 12-hour day on recreational vessels less than 100 GRT is submitted, service credit will not be given at time-and-a-half credit.
- An employer sea service letter or small vessel sea service form may state a mariner worked a minimum of 4 hours. This may be acceptable if the vessel is less than 100 GRT, but is never acceptable on a vessel over 100 GRT.
- As a standard, vessels under 100 GRT do not have a Certificate of Inspection (COI) and service on board these vessels will not be credited at time-and-a-half. However, some

vessels under 100 GRT do have a COI and are authorized for a two-man watch system. If a two-man watch is indicated in the employer letter, and can be verified, service will be credited at time-and-a-half.

- Public vessels such as research vessels are not required to have a COI. In such cases, if the employer letter states the mariner worked 12-hour days on a research vessel without a COI, we will credit sea service as time-and-a-half.

### **Time-and-a-half credit for vessels over 100 GRT:**

The minimum number of hours worked for vessels over 100 GRT is no less than 8 hours.

- [46 CFR 15.705\(b\)](#) states the following: “Subject to exceptions, [46 USC 8104](#) requires that when a master of a seagoing vessel of more than 100 gross tons establishes watches for the officers, sailors, coal passers, firemen, oilers and watertenders, the personnel shall be divided, when at sea (Oceans/Near Coastal Waters/Great Lakes), into at least three watches and shall be kept on duty successively to perform ordinary work incident to the operation and management of the vessel. The Coast Guard interprets sailors to mean those members of the deck department other than officers, whose duties involve the mechanics of conducting the ship on its voyage, such as helmsman (wheelsman), lookout, etc., and which are necessary to the maintenance of a continuous watch.”
- As a standard, vessels of 100 or more GRT have COI’s and when at sea require a three-man watch system. In most cases the standard dictates that time-and-a-half credit will not be given. However, in rare cases some vessels of 100 GRT or more do not have a COI and therefore have no manning standards. If no manning requirements exist and the employer letter indicates twelve hour days, service may be credited at time-and-a-half.

### **Towing Vessels, Offshore Supply Vessels (OSVs) and Barges:**

[46 CFR 15.705 \(c\)](#) states the following: “Subject to exceptions, [46 USC 8104\(g\)](#) permits the officers and crew members (except the coal passers, firemen, oilers, and watertenders) to be divided into two watches when at sea and engaged on a voyage of less than 600 miles on the following categories of vessels:

1. Towing vessel
2. Offshore supply vessel
3. Barge.”

- This means if a sea service letter is received for a Towing Vessel, an OSV, or a Barge and the letter states 12-hour days – service may be credited at time-and-a-half.

- It should be noted that coal passers, firemen, oilers and watertenders on these vessels will not receive credit at time-and-a-half.

**Fish Processing Vessels:**

[46 CFR 15.705\(e\)](#) states the following: Fish processing vessels are subject to various provisions of [46 USC 8104](#) concerning watches. Credit will not be given for 12-hour days for the capacity listed as Combi, as this is not deck or engine service.

**Mobile Offshore Drilling Units (MODUs):**

The definition of a day (for MODUs) in accordance with [46 CFR 10.107\(b\)](#) is the following: “When computing service required for MODU endorsements, a day is a minimum of four hours, and no additional credit is received for periods served over eight hours.”

When sea service is submitted indicating deck/engine time and there is no breakdown of the number of days served in each capacity, the evaluator may request a breakdown of the number of days served in each capacity OR the evaluator may do a 50/50 split; crediting the applicant with 50% deck service and 50% engine service. If using the 50/50 split, service may only be credited as an 8-hour day. Credit for a 12-hour day will not be given.