

To All;

I received a number of emails and phone calls from industry members seeking clarification on the application of the VSO training and certification requirements to towing vessels less than 200 GRT, in 46 CFR 15.103(e) and (f). After reviewing all of the regulations and discussing it with the various offices I offer the following interpretations to the three possible scenarios that the Coast Guard will be considering with regard to implementation of the VSO requirements:

1. Persons serving as VSO on vessels of less than 200 GRT (other than passenger vessels subject to subchapter H of title 46 CFR) engaged in domestic voyages between ports in the contiguous United States (does not include Alaska or Hawaii) that operate inside the boundary line are not required to carry a VSO certificate.
2. Persons serving as VSO on vessels of less than 200 GRT (other than passenger vessels subject to subchapter H of title 46 CFR) engaged in domestic voyages between ports in the contiguous United States (does not include Alaska or Hawaii) that operate beyond the boundary line, but within near coastal waters (as defined in 46 CFR 10.103 -- within 200 miles of the coast of the United States), will be required to meet the certification requirements for VSO. These persons will be issued an STCW VSO endorsement with a near coastal limitation, but will not be required to undergo any additional training in order to receive the endorsement. Affected mariners may request the endorsement from the National Maritime Center and need not show proof of having completed a Coast Guard-accepted training course in order to receive it.
3. Persons serving as VSO on vessels of less than 200 GRT (other than passenger vessels subject to subchapter H of title 46 CFR) engaged in domestic voyages (between US ports) that go beyond the boundary line and either 1) travel outside U.S. near coastal waters as defined in 46 CFR 10.103 (i.e., beyond 200 miles offshore) or 2) enter the waters of another Administration will be required to meet the training and certification requirements for VSO. These persons will be issued an STCW VSO endorsement with no limitations. Affected mariners may request the endorsement from the National Maritime Center and need to show proof of having completed a Coast Guard-accepted training course in order to receive it.

We recognize that this interpretation is somewhat different from the one we originally provided in response to questions submitted by AWO. However, after reviewing these scenarios and all of the underlying STCW regulations applicable, we believe this interpretation accurately reflects the requirements of STCW. Please feel free to contact me if you have any further questions.

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