

Commanding Officer
U. S. Coast Guard National Maritime Center

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16721 NMC Guidance Document 01-05

From: Commanding Officer, U. S. Coast Guard National Maritime Center

To: Distribution

Subj: ISSUANCE OF MERCHANT MARINERS' DOCUMENTS (MMDS) TO CADETS ATTENDING A MARITIME ACADEMY

Ref: (a) Title 46, Code of Federal Regulations (46 CFR), Section 12.25-25

1. PURPOSE. This document provides guidance to Regional Examination Centers (RECs) about the application of reference (a) and issuance of MMDs with multiple endorsements to cadets attending either the Federal Merchant Marine Academy or a state merchant marine academy.

# 2. ACTION.

- a. Commanding Officers of marine safety units with an REC should be guided by the information in this guidance document. Vessel operators, maritime labor organizations, individual mariners, and maritime training institutions may also find this information useful.
- b. The guidance in this document will clarify the standards for issuance of MMDs to cadets and reduce the administrative burden on the cadets and Coast Guard when the cadet is entitled to mariners' endorsements other than the cadet - deck or cadet - engine rating. This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to, nor does it impose, legally-binding requirements on any party.
- 3. DISCUSSION. Enclosure (1) provides information about the issuance MMDs endorsed as cadet - deck or cadet - engine.

Acting Commanding Officer

Encl: Cadet MMDs

Dist: Commandant (G-MSO) (G-MOC); Area Commanders (Am); All District Commanders (m); COs, all MSOs; All Activity Commanders; All RECs

#### CADET MMDs

The question of what endorsements, if any, other than Cadet (deck) or Cadet (engine) can legally appear on an MMD issued to a cadet has been an ongoing issue and was forwarded to Commandant (G-LMI) for review and determination. In a legal decision dated 26 January 2005, it was decided that the requirements of 46 CFR 12.25-25 apply only to cadets who are attending the U. S. Merchant Marine Academy (USMMA) at Kings Point. The regulatory requirement does not apply to students attending a state maritime academy.

### 1 General

- a. An application for an MMD endorsed as cadet must be accompanied by certification from a maritime academy to the effect that the applicant is enrolled in their maritime cadet program.
- b. Applications from cadets for MMDs that include entry-level or other endorsements valid for employment aboard merchant vessels will be evaluated and scrutinized to the same extent as any other applicant.
- c. Background checks are mandatory for all applicants, unless one has been conducted within the past two years.
- d. All applicants are subject to the physical evaluation guidelines for issuance of merchant mariners' documents as stated in NVIC 2-98.

### 2 For USMMA cadets

a. Cadets attending the USMMA, who qualify for an MMD endorsed for service other than as cadet, should be issued a second MMD with the endorsements for commercial service. Appropriate user fees should be charged for each MMD. The cadet may have only one of the two MMDs in his/her possession; the other MMD must be kept on file with the REC (usually NY). When the cadet desires to change his or her status from cadet to commercial mariner, he/she must exchange the cadet MMD for the MMD valid for commercial service (usually entry level ratings).

## 3 | For cadets at state maritime academies

a. If a cadet applies for an MMD endorsed as cadet, it may also be endorsed for entry-level ratings (or other commercial ratings for which the cadet is qualified). Cadets serving on an academy's training ship are not required to hold an MMD; however, some academies may require the cadets to do so to facilitate repatriation, if necessary. Cadets at state maritime academies, who make a cadet cruise on a commercial vessel, must hold an MMD endorsed at least as Cadet (deck or engine, as appropriate).