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NMC Policy Letter 09-01

April 26, 2001

From: Commanding Officer, USCG National Maritime Center

To: Distribution

Subj: EVALUATING EXPERIENCE ABOARD COMMERCIAL VESSELS THAT DO NOT
GET UNDERWAY OR THAT GET UNDERWAY FOR ONLY LIMITED PERIODS

Ref: (a) Title 46, Code of Federal Regulations (46 CFR), Section 10.211(e)
(b) COMDTINST 16000.8B, Marine Safety Manual, Vol. III, Section 10.B.7 &
12.C.13
(c) COMDTINST 16000.8B, Marine Safety Manual, Vol. III, Section 12.C.12
(d) 46 CFR 10.211(a)
(e) International Convention on Standards of Training, Certification and Watchkeeping
for Seafarers, 1978, as amended (STCW)

1. This policy letter sets forth the standards for crediting of sea service on vessels that may spend all or a significant amount of their time moored, such as casino vessels, oil spill response vessels (OSRV), lift-boats, and vessels operating in a semi-operational or reduced operating status.

2. Reference (a) provides for the evaluation of service in a marine related area, other than at sea, or on unique vessels, for a determination of equivalence to traditional service. Actual underway service is essential to development of the skills, experience, and knowledge expected of a licensed merchant marine officer or qualified rating. Time while moored may provide some of the professional experience, but it cannot substitute equally for actual underway experience.

3. Regional Examination Centers (REC) shall credit such time as follows:

a. **Service On Vessels That Do Not Get Underway**: This includes vessels that are actually in operation but do not get underway (such as dockside casino vessels), and whose service is mandated by the vessel's Certificate of Inspection (COI).

(1) **Engineering department**: Dockside service may be credited day-for-day for renewals, upgrades, recency, and original license/Merchant Mariner Document (MMD).

(2) **Deck department**: Dockside service may be credited as follows in accordance with reference (a):

(a) **Renewal**: Service is credited as "closely related service" for renewal of licenses and MMDs. Mariners who demonstrate three years of service within the last five years, in any capacity in the deck department, will be eligible for renewal. In addition, deck officers

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will be required to successfully complete the Rules of the Road open-book exercise. When submitted in combination with underway service, such service may be credited at the rate of three days of service equals one day of credit up to a maximum credit of 180 days.

(b) **Raise In Grade/Upgrade of MMD Rating:** Service may be credited for upgrade if it is similar in nature to the duties performed aboard an in-service, underway vessel. Such service may be credited for up to 180 days of the service required for an upgrade at the rate of three days of service equals one day of credit.

(c) **Original License or MMD:** Such service may be credited for up to one-half of the required service for the particular license or MMD applied for, but not more than 180 days of credit, at the rate of three days of service equals one day of credit.

b. **Service Aboard Commercial Vessels That Get Underway for Only Limited Periods:**

This includes vessels that are actually in operation and occasionally get underway for short voyages. On any day that a vessel gets underway, service by deck and engineering crewmembers may be credited, day for day, for renewals, upgrades, recency, and original license or MMD. This recognizes crew duties necessary for preparing the vessel before and after the voyage, as well as the duties associated with even a limited period of vessel operation, which fall into regular deck and engineering responsibilities for a vessel in traditional service. On days when these vessels do not get underway, service may be credited in accordance with paragraph 3.a.

c. **Service Aboard Commercial Vessels Operating in an Artificial Impoundment:** Service by deck and engineering crewmembers on vessels that are in operation within an artificial impoundment, and whose service is mandated by the COI, will be credited in accordance with paragraph 3.a.

d. **Service Aboard Liftboats:** Service may be credited without restriction on days when the vessel is underway. When elevated and in operation under authority of the vessel's COI, service may be credited as follows:

(1) **Engineering Department:** If the engineering plant is operational and engineering personnel are standing a regular watch, then service may be credited in accordance with paragraph 3.a.(1). If the engineering plant is non-operational, service shall be credited in the same manner as deck department personnel described in paragraph 3.a.(2).

(2) **Deck Department:** When elevated for extended periods service may be credited in accordance with 3.a.(2).

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e. **Service On Vessels In a Semi-Operational Status**: This includes vessels such as oil spill response vessels, anchored (extended-period) pre-positioned ready reserve vessels, and other vessels moored and in a semi-operational or “on-call” status, which are maintained, manned, and operated to facilitate a rapid deployment. Service may be credited without restriction on days when the vessel is underway. Moored service may be credited as follows (except as otherwise provided for in reference (b) for Military Sealift Command (MSC) operational tempo (OPTEMPO) ships and other fast sealift ships):

(1) **Engineering Department**: If the engineering plant is operational and engineering personnel are standing a regular watch or required to perform maintenance or repair, then service may be credited in accordance with paragraph 3.a.(1). If the engineering plant is non-operational, service shall be credited in the same manner as deck department personnel described in paragraph 3.a.(2).

(2) **Deck Department**: When moored, service may be credited in accordance with paragraph 3.a.(2).

f. **Reduced Operating Service (ROS) Vessels**: There are a variety of vessels that spend the majority of their time moored, with reduced crews, and limited operating systems. Service may be credited without restriction on days when the vessel is underway. During all other times service shall be credited as follows:

(1) **Engineering Department**: Service shall be credited in accordance with reference (c).

(2) **Deck Department**: Service shall be credited in accordance with paragraph 3.a.(2).

g. **Oil Spill Response Barges (OSRBs)**: These vessels are non-self propelled and spend significant time at anchor. They are not required to have licensed personnel onboard and do not have a pilothouse or engineering space. Service may be credited as follows:

(1) While engaged in spill response operations or exercises, regardless of underway, anchored, or moored status, service may be credited day-for-day toward deck department ratings and renewals.

(2) While anchored or moored in a standby status, service may be credited at the rate of one day sea service credit for every four days worked toward deck department ratings and renewals for up to six months of the service required for any deck rating that requires 12 months or more of service, and not more than half of the service required for other deck ratings (i.e. AB-OSV & AB-Fish). Such service may also be credited as “closely related service” for the purpose of renewing a deck rating.

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(3) While engaged in oil collection or transfer operations, service may be credited day-for-day toward qualification as Tankerman-PIC (Barge). While anchored or moored and in a standby status, such service may be credited as meeting the requirements contained in 46 CFR 13.303(a)(2).

(4) Service on OSRBs will not be credited toward qualification as Rating Forming Part of the Navigation Watch under reference (b).

h. **Acceptance of Time -And-One-Half Service**: With the exception of vessels described in paragraphs 3.e and 3.f above, if a mariner works a twelve-hour day in a crew position on a vessel of over 100 gross tons, and such a work schedule is legal, time-and-one-half credit should be given. The mariner must provide adequate documentation from the operating company that the 12-hour day was authorized and practiced. Twelve-hour days will normally consist of watchstanding, but could consist of day-work directly involved with the operation and maintenance of the vessel when operating under the authority of the COI. Work hours for some vessels are specified in Title 46, United States Code 8104. Sea service letters indicating possible violation of regulation or law, should be referred to a Coast Guard marine investigating officer.

4. Some mariners may be serving in positions that do not provide qualifying service for license upgrade. In some instances, it may be appropriate for companies to develop an “approved course” incorporating simulator, formal in-house training, and underway assessment of skills to substitute for the required service. Requests for approval of such courses are to be forwarded to the National Maritime Center (NMC-4B). Officers in Charge, Marine Inspection, (OCMIs) are encouraged to partner with industry to develop programs geared toward equivalencies.

5. OCMIs may also consider issuing class-specific licenses to facilitate promotion and employment within a specific industry, such as liftboats. These vessels are highly specialized and may spend significant time elevated. In this case it may be appropriate to permit a raise of grade or original license limited to lift-boats.

6. Companies may apply for special consideration if their vessels have operating schedules or characteristics that they feel warrant additional service credit. Requests for such consideration may be submitted for evaluation to the National Maritime Center (NMC-4C) via the OCMI. The requests must include a comprehensive description of the vessel(s), operating schedule, watchstanding duties, percentage of underway service, and any other details that may support additional credit.

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7. In accordance with reference (d), evaluators should make every effort to determine the amount, nature, and routes upon which a mariner's service was gained, as well as the appropriate vessel information: vessel name, gross tonnage, shaft horsepower and official number. It may not be evident in a service letter that a vessel is operating in a moored status. Review of the COI may provide information critical to the evaluation of a mariner's service. Particular attention should be paid to any special operating conditions or restrictions noted on the COI. In addition, the vessel's name may provide an indication of the vessel's service utilizing words such as "responder" (OSRV) or "casino." And, when a service letter originates from a company outside of the evaluator's zone, it may be prudent to contact the OCMI/REC most likely to be familiar with the vessel and its operations.

8. To assist RECs, a listing of casino vessels known to be in operation as of the publishing of this policy letter is provided in enclosure (1). It is not a complete listing and represents only one class of vessels that may have limited underway operating schedules. A listing of vessels operated by the MSC is available at: <http://www.msc.navy.mil> .

9. Reference (e), is currently being implemented. Mariners who desire a seagoing license and either began service or training after August 1, 1998, or will not qualify for the license until after January 31, 2002, will be required to establish competence through both subject-area examinations and practical demonstrations with formal assessments. Service on vessels discussed in this policy letter may have further limitations imposed toward meeting the requirements for those ratings and licenses subject to the requirements of the STCW.

//s//

M. S. BOOTHE

Encl: (1) Listing of Operating Casino Vessels

Dist: All Area Commanders
All Activity Commanders
All District Commanders (m)
All COs, MSOs
All RECs
Commandant (G-MSO-1)
Commandant (G-MOC-1)

OPERATING CASINO VESSELS

CG Atlantic Area

First CG District

None reported

Fifth CG District

None reported

Seventh CG District

STARDANCER

Stardancer Casinos, Inc
1180 HWY 17 North
Little River, SC 29566
843-280-7731

ELDORADO

Stardancer Casinos, Inc.

SUNCRUZ III

Casino Ventures, Inc.
4738 Ocean Street
Atlantic Beach, FL 32233
843-280-8322

SUNCRUZ VII

Casino Ventures, Inc.

SUNCRUZ VIII

Casino Ventures, Inc.

SUNCRUZ X

Casino Ventures, Inc.

MAGIC MERMAID CASINO

Casino Ventures, Inc.

Eighth CG District

ALTON BELLE CASINO II

Alton, IL 62002-6232

219 Piasa St.

Alton Gaming Company

AMERISTAR II

Ameristar Casino Council Bluffs
2200 River Rd.
Council Bluffs, Iowa 51501

ARGOSY V (a.k.a. Belle of Soix City)

Missouri Gaming
219 Piasa St.
Alton, IL 62202

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CASINO QUEEN

Casino Queen, Inc.
200 S. Front St.
East St. Louis, IL 62201

CASINO ROCK ISLAND

Casino Rock Island Boat Works
P.O. Box 7777
Rock Island, IL 61204

Enclosure (1)

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CATFISH BEND RIVERBOAT CASINO II

Catfish Bend Casino, LC
P.O. Box 471
Ft. Madison, IA 52627

CELEBRATION BELLE

Schadler Enterprises
2501 River Dr.
Moline, IL 61265

DIAMOND JO

Peninsula Gaming Company, LLC
P.O. Box 1750
Dubuque, IA 52004

HARVEY's KANESVILLE QUEEN

Harvey's Iowa Management
Company, Inc.
1 Harvey's Blvd.
Council Bluffs, IA 51501

JUDY's PRIZE

Harras's Entertainment, Inc.
1023 Cherry Road
Memphis, TN 38117

LADY LUCK BETTENDORF

Lady Luck Gaming Corp.
P.O. Box 1641
Pobs Ferry Road
Biloxi, MS 39532

MISS MARQUETTE

Isle of Capri Casinos
30325 128th Street
P.O. Box 460
Marquette, IA 52158

PRESIDENT

Isle of Capri Casinos

MISSISSIPPI BELLE II

Roberts River Rides, Inc.
311 Riverview Drive
P.O. Box 1234
Clinton, IA 52733

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PAR-A-DICE

Par-A-Dice Gaming Corp.
21 BlackJack Blvd.
East Peoria, IL 61611

PRESIDENT

Isle of Capri Davenport, Inc.
221 Brady Street
Davenport, LA 52801

TREBLE CLEF

Isle of Capri Davenport, Inc.

PLAYERS RIVERBOAT CASINO II

Players Riverboat Casino
203 South Ferry St.
Metropolis, IL 62960

CROWN CASINO

St. Charles Gaming Company, Inc.
2131 Oak Park Blvd.
P.O. Box 3290
Lake Charles, LA 70602-3290

GRAND PALAIS

Grand Palais Riverboat, Inc.
100 Westlake Ave
Westlake, LA 70669

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STAR	Showboat Star Partnership 800 Bilbo Street Lake Charles, LA 70601
PLAYERS RIVERBOAT III	Players Lake Charles LLC 507 North Lakeshore Drive Lake Charles, LA 70601
FANTASEA	Extasea Casino Cruises, Inc. 2115 Bayou Black Houma, LA 70360
NEW YORKER	Sophlex Enterprises, Inc. P.O. Box 542349 Merritt Island, FL 32954
ARGOSY III	Argosy of Louisiana, Inc. Maritime Building II 103 France Street Baton Rouge, LA 70802
CASINO ROUGE	Casino Rouge Marine Operators 1717 River Road North Baton Rouge, LA 70802
TREASURE CHEST	Treasure Chest Casino, LLC 2950 S. Industrial Road Las Vegas, NV 89109
BELLE OF ORLEANS	Vessel Management Services, Inc. P.O. Box 770254 New Orleans, LA 70177-0254
BOOMTOWN BELLE II	Westbank Riverboat Services, Inc. 3700 Vonnie Drive Harvey, LA 70058

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GLORY OF ROME

RDI/Caesars Riverboat Casino LLC
11999 Avenue of the Emperors
Elizabeth, IN 47117

CITY OF EVANSVILLE

Aztar Indiana Gaming Corp.
421 N. W. Riverside Drive
Evansville, IN 47708

MISS BELTERRA

Belterra Resort, LLC.
777 Belterra Drive
Belterra, IN 47020-9402

GRAND VICTORIA II

Grand Victoria Casino & Resort
600 Grand Victoria Drive
Rising Sun, IN 47041

ARGOSY VI

Indiana Gaming Company, L.P.
219 Piasa Street
Alton, IL 62202

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Ninth CG District

BLUE CHIP	Blue Chip Casino, LLC 2 Easy Street Michigan City, IN 46360 219(or 888)-879-6631
CITY OF LIGHTS 1	Hollywood Casino-Aurora, Inc. 49 W. Galena Blvd Aurora, IL 60506 630-801-7257
CITY OF LIGHTS II	Hollywood Casino-Aurora, Inc.
EMPRESS 1	Empress River Casino, Corp 2300 Empress Drive P.O. Box 2789 Joliet, IL 60434 815-744-9400
EMPRESS II	Empress River Casino, Corp
EMPRESS III	Empress Casino Hammond, Inc. 825 Empress Drive Hammond, IN 46320 219-473-7000
GRAND VICTORIA	Elgin Riverboat Resort DBA Grand Victoria Casino 250 S. Grove Avenue Elgin, IL 60120 847-468-7000
MAJESTIC STAR	Majestic Star Casino, LLC 1 Buffington Harbor Drive Gary, IN 46406-3000 219-977-7777

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NORTHERN STAR

Des Plaines Development
150 N. Scott Street
Joliet, IL 60431
815-740-7800

SOUTHERN STAR II

Harras's Illinois Corp.
1023 Cherry Road
Memphis, TN 38117
815-740-2356

TRUMP CASINO

Trump Indiana, Inc.
6012 Industrial Highway
Gary, IN 46403
888-218-7867

WINSTAR

Showboat Mardigras Casino
Post Office Box 777
East Chicago, IL 46312
219-378-3000