

U.S. Department  
of Transportation

United States  
Coast Guard



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NMC Policy Letter 15-02  
21 August 2002

From: Commanding Officer, USCG National Maritime Center  
To: Distribution

Subj: SEA SERVICE ON VESSELS MEASURED UNDER THE INTERNATIONAL TONNAGE  
CONVENTION SYSTEM (ITC)

Ref: (a) International Convention on Standards of Training, Certification and Watchkeeping  
for Seafarers, 1978 (STCW)  
(b) Title 46, Code of Federal Regulations, Part 10  
(c) Navigation and Vessel Inspection Circular 11-93, as amended, *Applicability of  
Tonnage Measurement Systems to U. S. Flag Vessels*

1. PURPOSE. This policy letter provides guidance to the Regional Examination Centers about the credentialing requirements for a mariner to serve on a vessel to which ITC tonnage applies and the evaluation and application of such sea service for the purposes of issuing licenses and STCW certificates.

2. ACTION.

- a. Commanding officers of units with a Regional Examination Center (REC) shall be guided by the information in this policy letter.
- b. Commanding officers of units with marine safety responsibilities should bring this policy letter to the attention of the maritime industry and to institutions within their area of responsibility that offer U. S. Coast Guard approved training
- c. This policy letter will be distributed by electronic means only. It is available on the World Wide Web at <http://www.uscg.mil/STCW/m-policy.htm>.

3. DIRECTIVES AFFECTED. NMC Policy Letter 17-98 is superseded and cancelled.

4. BACKGROUND. Reference (a) was written with break points at the 200 and 1,600 gross registered tons (GRT) levels. Enhanced qualifications were required of mariners certificated for service on vessels of higher tonnages. The ITC provided international standards for the calculation of vessels' tonnages and generally resulted in higher tonnages than the gross registered tonnages calculated under former national schemes. When reference (a) was amended in 1995, the STCW kept pace and included different break points based on gross tonnage calculated under the ITC. The amended STCW also allowed a signatory Party to replace the tonnage limitations on STCW certificates as follows:

- a. 200 GRT could be replaced by 500 GT; and
- b. 1,600 GRT could be replaced by 3,000 GT.

Subj: SEA SERVICE ON VESSELS MEASURED UNDER THE INTERNATIONAL TONNAGE SCHEME (ITC)

5. DISCUSSION.

- a. A mariner who holds a license limited to either 200 GRT or 1,600 GRT may have the corresponding GT endorsed on his or her license and STCW certificate upon request. The corresponding tonnages will be routinely endorsed on the license and STCW certificate when they are originally issued or renewed.
- b. The licensing regulations, reference (b), still reflect the 200 GRT and 1,600 GRT thresholds. As new vessels enter service and have only a GT assigned, it becomes difficult to evaluate such service when a mariner applies for a raise in grade or increase in the scope of his mariner's credential.
- c. Some vessels have tonnage calculated both in GRT and GT as discussed in reference (c). For these vessels, one tonnage may apply for a domestic voyage, and the other may apply to a foreign voyage. The officers on these vessels must hold a license with a tonnage level appropriate to the tonnage system applicable to the service of the vessel. For example, if a vessel has tonnages of 375 GRT and 3,300 GT, a mariner with a license of 500 GRT can serve on the vessel when the GRT applies to the voyage (usually a domestic voyage). He or she would be credited with service on a vessel of 375 GRT. If the vessel is on a voyage where the 3,300 GT applies (usually an international voyage), the officer must hold a license valid for service on a vessel of that tonnage. When crediting that sea service, the mariner will be credited with sea service on a vessel of 3,300 gross tons.
- d. In applying 46 CFR 10.402(a) when evaluating sea service, service on vessels of less than 3,000 GT shall be considered equivalent to service on a vessel of less than 1,600 GRT for qualifying for an unlimited license. Similarly, service on a vessel of 500 GT or less shall be considered as equivalent to service on a vessel of 200 GRT or less.
- e. A mariner holding a license limited to service on vessels of not more than 1,600 GRT/3,000 GT may apply for a third mate's license and present service on vessels to which the GT applies. When that service is evaluated under 46 CFR 10.407(c) for a tonnage limitation in accordance with 46 CFR 10.402(b), the GT may be used to determine the limitation. For example, a mariner serves on a vessel of 2,500 GT and applies for an unlimited license. Applying 46 CFR 10.402(a), the mariner is considered to have service on a vessel of less than 1,600 GRT; therefore, a tonnage limitation on the license is necessary. When determining the tonnage limitation, use the figure of 2,500 GT. If the mariner has more than 50% of his or her sea service on that vessel, he or she would be entitled to a tonnage limitation of 4,000 GRT. If the mariner has at least 25%, but less than 50%, of his or her sea service on that vessel, he or she would be entitled to a tonnage limitation of 3,000 GRT.
- f. If a mariner qualifies for an unlimited license with a tonnage limitation calculated under 46 CFR 10.407, the unlimited license shall not be limited to less than 2,000 GRT.



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All Activity Commanders; All RECs