

Sea-time Requirements for Towing Licenses

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License	Sea-time (8-hour days) 3-watch System	Sea-time (12-hour days) 2-watch System
Apprentice Mate / Steersman of Towing Vessels ¹	18 months ²	12 months ²
Mate / Pilot of Towing Vessels	30 months (including 12 months as apprentice mate / steersman)	20 months (including 8 months as apprentice mate / steersman)
Master of Towing Vessels	48 months (including 18 months as mate / pilot, not limited to harbor assist work)	32 months (including 12 months as mate / pilot, not limited to harbor assist work)
Towing Vessel endorsement placed upon an existing limited or unlimited-tonnage master, mate or 1st class pilot's license. ³	30 days⁴ of "training and observation" (90 days for Western Rivers)	20 days⁴ of "training and observation" (60 days for Western Rivers)

Note 1: this is really only a provisional license or "learners permit". An Apprentice Mate or Steersman must be under the **constant** and **direct** supervision of a licensed Master, Mate or Pilot **at all times** when standing a navigation watch.

Note 2: as per 46 CFR 10.466, up to 6 months (of 8-hour days) or 4 months (of 12-hour days) of the total required service *may* have been acquired on vessels other than towing vessels.

Note 3: for those holding unlimited-tonnage licenses, or limited-tonnage licenses of **over** 200 GRT (U.S. regulatory tonnage system), the only other requirement is completion of a TOAR. Those holding licenses of 200 GRT or **less** must also have 3 years of service (in 8-hour days) or 2 years of service (in 12-hour days) as **master** and pass the CG's limited written exam on towing knowledge.

Note 4: the 30-day requirement applies only to the *Oceans, Near Coastal* and *Great Lakes-Inland* routes. The *Western Rivers* endorsement is not considered to be a subordinate route to the others because of the highly specialized skills and knowledge required to safely operate on it, hence the 90-day requirement.

The table above shows the minimum sea-time required aboard actual *towing vessels* to qualify for the towing licenses contained in Title 46, Chapter I, Part 10 of the Code of Federal Regulations (specifically, 46 CFR § 10.463 thru 10.466). These regulations are based on standing eight hours of navigation watch per day in a three-watch system and, because of this, they don't reflect the reality of working on the vast majority of towing vessels, which operate nearly exclusively on the two-watch system. To remedy that the column for 12-hour days in the two-watch system has been provided for comparison.

A far more more useful way of evaluating and planning for the real-world training and manning requirements of the towing industry is needed. The table below shows the minimum amount of actual *elapsed* calendar time required aboard *towing vessels*, which factors in both the time spent at work and the time spent at home between work tours, needed to qualify for the different towing licenses. This is based upon the industry-standard “equal-time” schedule of one day off for each day worked. This often takes the form of a 2 weeks-on / 2 weeks-off schedule, although schedules of 3 weeks-on / 3 weeks-off or even 30 days-on / 30 days-off are also used. Also included is the “two for one” schedule of working two days to earn one day off, or 2:1, that is prevalent in the Gulf of Mexico and Gulf Coast region. This typically takes the form of a four weeks-on / two weeks-off schedule.

License	Equal-time Schedule	Two-for-one Schedule
Apprentice Mate / Steersman of Towing Vessels	2 years	1 year & 6 months
Mate / Pilot of Towing Vessels	3 years & 4 months	2 years & 6 months
Master of Towing Vessels	5 years & 4 months	4 years
Towing Vessel endorsement placed on an existing limited or unlimited-tonnage master, mate or 1st class pilot’s license.	1 month & 10 days⁵ (4 months for Western Rivers)	3 weeks (2 months & 1 week for Western Rivers)

An important reminder: if you leave a company make sure you get a letter of service from them right away⁶. The longer you wait the harder it’s likely to get, or they could be sold or go out of business and the records lost forever. The Coast Guard *may* accept pay stubs that indicate what company you worked for, your position and how many days you worked per pay period, especially if you can back them up with your own detailed personal work log. At the very least make sure that you have *all* of the vital statistics of every boat you worked on, no matter how briefly. Making copies of the *Certificate of Documentation* or *Certificate of Inspection* is a good way to do this. Companies are required by federal law to furnish you, upon written request, with a complete and accurate letter of your sea service within 30 days. If you encounter any undue difficulties with this process you should contact your nearest Coast Guard *Officer in Charge, Marine Inspection* (OCMI) for assistance or to lodge a complaint.

Note 5: based on a 2 week-on & off schedule. For the 3 weeks-on & off or longer schedules the threshold is reached at the 3-week mark.