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To: USCG

QUESTION: Why is the change being made? Were there problems with the previous rule?

*USCG ANSWER: The proposed rule, which adds an alternative method for license progression and career path advancement, is offered in response to a request from industry through the petition for rulemaking process outlined in 33 CFR 1.05. The specific company seeking the change owns both towing vessels and other vessels of less than 200 GRT. Under a revision to the regulations published in 2001, managing personnel between the two types of vessels became more difficult. The company sought this change to provide it with the ability to retain employees and ensure their advancement.*

*Prior to the 2001 rule, mariners were able to enter the towing industry simply by holding a license as master of self-propelled vessel without having any experience serving aboard towing vessels. The 2001 rule change, which impacted the towing industry by reducing points of accession, sought to ensure those persons operating towing vessels were qualified and demonstrated proficiency on towing vessels. The proposed alternate progression maintains those goals while also providing experienced mariners another path into the towing industry.*

*v/r,*

*LT Andrew Pate  
U.S. Coast Guard  
Congressional Liaison  
U.S. House of Representatives*