



COMDTPUB 16700.4  
NVIC 4-01  
MAY 21, 2001

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. **4-01**

Subj: LICENSING AND MANNING FOR OFFICERS OF TOWING VESSELS

1. PURPOSE. This Navigation and Vessel Inspection Circular (NVIC) clarifies and provides specific guidance on licensing and manning for officers of towing vessels.
2. DIRECTIVES AFFECTED. Marine Safety Manual, Volume III, Chapters 10, 13, 19, 20, and 26, COMDTINST M16000.8B.
3. ACTION.
  - a. Owners, operators, and masters of towing vessels should become familiar with the change in the manning requirements for towing vessels. Operators of these vessels should also become familiar with the change in the training and license progression required of those mariners pursuing licenses to operate towing vessels.
  - b. Officers in Charge, Marine Inspection (OCMIs), should bring this Circular to the attention of owners and operators of towing vessels, mariners, professional organizations, labor unions, and other parties with maritime interests.
  - c. Regional Examination Centers (RECs) should use the guidance provided by this NVIC to evaluate those mariners applying for licenses to operate towing vessels.
  - d. This NVIC is available on the World-Wide Web at:  
<http://www.uscg.mil/hq/g-m/nvic/index.htm>. The Coast Guard will distribute it internally by electronic means only.

4. BACKGROUND.

- a. After the allision, in September 1993, of a towing vessel and its barges with a railroad bridge near Mobile, Alabama (Amtrak casualty), the Secretary of Transportation initiated an examination of the safety of towing vessels. This examination resulted, in part, in the

DISTRIBUTION – SDL No. 139

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z
A																										
B	*	1	1																							
C			1								1		*	1												
D											1	*														
E														1	1											
F																										
G																										
H																										

NON-STANDARD DISTRIBUTION: (See page 15)

## NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

development of a report entitled *Review of Marine Safety Issues Related to Uninspected Towing Vessels*. Among the report's recommendations were the need to improve licensing, training, and qualifications of operators of uninspected towing vessels (OUTVs) and to improve navigational safety on towing vessels.

- b. Several other casualties involving towing vessels followed the Amtrak casualty. Each demonstrates the urgent need to examine the rules for licensing of all operators of towing vessels. After a thorough examination of the rules and a number of public meetings, we published a notice of proposed rulemaking and a supplemental notice of proposed rulemaking, on June 19, 1996 [61 FR 31332], and October 27, 1997 [62 FR 55548], respectively. These notices proposed changes for the licensing of officers of towing vessels. We revised the proposed rule in response to public comment, and published an interim rule on November 19, 1999 [64 FR 63213]. We revised it further in a third interim rule published in April 2001. These rules are effective on May 21, 2001.
- c. Before this rule, the license structure for towing vessels had, effectively, a single grade of license, OUTV. (The license for 2<sup>nd</sup>-class OUTV has largely gone unused in the towing industry, resulting in this limited license progression.)
- d. Under the licensing scheme in effect until May 21, 2001, a mariner holding a license as master of inspected, self-propelled vessels stands equivalent to OUTV and may operate a towing vessel up to the tonnage limit on the face of the license. This equivalence extends to individuals licensed as mate or first-class pilot of inspected self-propelled vessels greater than 200 gross register tons (GRT).
- e. The licensing process, before May 21, 2001, under Title 46, Code of Federal Regulations, section 10.211 (46 CFR 10.211), required a mariner to submit official documents from marine employers signed by appropriate officials or licensed masters. Mariners owning vessels of not more than 200 GRT could attest their own service. Mariners not owning vessels and working on vessels less than 200 GRT needed to obtain letters or other evidence of service from licensed personnel or from owners of vessels.
- f. The rules in effect on or after May 21, 2001, provide a new license title for those officers operating towing vessels, master of towing vessels. This license divides into a multi-purpose license and a limited license. License progression comes about through the use of licenses as apprentice mate (steersman) and mate (pilot) of towing vessels. After suitable service on towing vessels a mariner will undergo examination by the Coast Guard, and, if successful, receive a license as apprentice mate (steersman). After training and assessment, he or she will receive a license as mate (pilot) of towing vessels. The license title is mate (pilot) of towing vessel; however, a mariner may request the use of either mate or pilot of towing vessels according to regional preference. After further experience he or she will receive a license as master of towing vessels without further requirement for completion of

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

written examinations, with certain exceptions. A mariner seeking endorsements under STCW may need further training and assessment to obtain the necessary certificate.

- g. Officers currently operating towing vessels will not have to convert to the new license until their current licenses require renewal on or after May 21, 2001. Officers with at least 90 days' experience operating towing vessels will not lose any authority to operate those vessels. Their licenses will be renewed as indicated later in this Circular.
- h. The following table sets out the requirements for a license under the rules in place before May 21, 2001, and whether the new rule revised them.

Minimum age 46 CFR 10.201(f)	No change under new rule
Citizenship 46 CFR 10.201(e)	No change under new rule
Physical examination 46 CFR 10.205(d)	No change under new rule
Experience or training 46 CFR 10.464	<i>Change under new rule</i>
Character check and references 46 CFR 10.205(f)	No change under new rule
Firefighting: certificates 46 CFR 10.205(g)	No change under new rule
First aid and cardiopulmonary resuscitation certificates 46 CFR 10.205(h)	No change under new rule
Professional Examination 46 CFR 10.205(i)	<i>Change under new rule</i>
Practical demonstration of skills 46 CFR 10.304(h)	<i>Change under new rule</i>

- i. Assistance towing underwent no change with this rule. We still consider assistance towing to be 'towing a disabled vessel for consideration.' We have clarified the definition of 'disabled vessel' [see paragraph 5.a.] to specify what vessels we consider to be disabled

## NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

vessels. Experience operating assistance-towing vessels is not comparable to operating other types of towing vessels.

### 5. DEFINITIONS.

The following definitions appear in the rules in effect on or after May 21, 2001, and as published in the CFR:

- a. Disabled vessel means a vessel that needs assistance, whether docked, moored, anchored, aground, adrift, or having been under way with a loss of propulsion; but does not mean a barge or any other vessel not regularly operated under its own power.
- b. Harbor assist means the use of a towing vessel during maneuvers to dock, undock, moor, or unmoor a vessel or to escort a vessel with limited maneuverability.
- c. Inland waters means the navigable waters of the United States shoreward of the Boundary Lines as described in 46 CFR part 7, excluding the Great Lakes and, for towing vessels, excluding the Western Rivers. For establishing credit for sea service, the waters of the Inside Passage between Puget Sound and Cape Spencer, Alaska, are inland waters.
- d. Pilot of Towing Vessels means a qualified officer of towing vessels operating on inland routes. (This is an alternative term for mate of towing vessels).

The following definitions are necessary to clarify this Circular, though they may not appear in the rule as published in the CFR:

- e. Assessment means evaluation.
- f. Designated examiner means a person who has been trained or instructed in techniques of training or assessment and is otherwise qualified to evaluate whether a candidate for a license, document, or endorsement has achieved the level of competence required.
- g. Gross Register Tons (GRT) means tonnage as measured under the domestic measurement process as detailed in Title 46, United States Code, section 14501 [46 U.S.C. 14501].
- h. License for master of towing vessels authorizes service within any route authorized by the license, including harbor assist and limited local area.
- i. License for master of towing vessels, limited allows a mariner with limited geographic experience an opportunity to obtain a license. This will authorize service only in limited geographic areas.

## NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

- j. License for mate (pilot) of towing vessels pertains to a qualified officer subordinate to a master of towing vessels. A mate (pilot) of towing vessels may stand a watch, but a master of towing vessels must also be on the vessel.
  - k. License for apprentice mate (steersman) pertains to a mariner in training to become master or mate (pilot) of towing vessels, who has passed all required examinations for the applicable towing license. Nonetheless, he or she may only serve under the direct supervision of an officer qualified for towing vessels.
  - l. Limited local area means a defined limited geographic area designated by the local OCMI.
  - m. National Driver Registry (NDR) the National Driver Registry as referred to in 46 CFR 10.201(i).
  - n. Proficiency means having the practical ability to apply the necessary knowledge, skill, and experience.
  - o. Regional Examination Center (REC) refers to any of the Coast Guard licensing offices as defined in 46 CFR 10.105.
  - p. Route means the general geographic body or bodies of water endorsed on the face of a license (specifically, Oceans, Near-coastal, Great Lakes–inland, Western Rivers, or Limited Local Area).
  - q. Simulator course is a course that uses simulation equipment in evaluating a mariner’s proficiency.
  - r. Towing Officer’s Assessment Record (TOAR) is a record used to document the training and assessment of a mariner in the towing industry.
  - s. Western Rivers means the Mississippi River, its tributaries; South Pass and Southwest Pass, to the navigational demarcation lines dividing the high seas from harbors, rivers, and other inland waters of the United States; Port Allen—Morgan City Alternate Route; that part of the Atchafalaya River above its junction with the Port Allen—Morgan City Alternate Route including the Old River and the Red River; and those waters specified in 33 CFR 89.25.
6. APPLICABILITY.
- a. All mariners in the towing industry are subject to the rules effective on May 21, 2001.

## NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

- b. Mariners with current OUTV licenses will receive licenses as masters of towing vessels. They will receive their new licenses at their first upgrades or renewals following May 20, 2001.
- c. Other licensed officers with authority and experience operating towing vessels may have their licenses endorsed for service on towing vessels. Any relevant endorsements will be added to their licenses at their next upgrades or renewals after May 20, 2001 (if at all). In some cases licensed officers holding completed TOARs do not require endorsements.

### 7. DISCUSSION.

#### a. Categories of licenses:

(1) Master of towing vessels: replacement for the current OUTV. The following limited licenses are also available:

(a) Master of towing vessels (harbor assist): a license restricted to harbor towing vessels (not issued during the initial phase-in period, the period before publication of the final rule).

(b) Master of towing vessels (limited): a license limited to a local geographic area or special use.

(2) Mate (pilot) of towing vessels: (formerly 2<sup>nd</sup>-Class OUTV). The following limited licenses are also available:

(a) Mate (pilot) of towing vessels (harbor assist): a license restricted to harbor towing vessels (not issued during the initial phase-in period).

(b) Mate (pilot) of towing vessels (limited): a license limited to a local geographic area or special use.

(3) Apprentice mate (steersman): a mariner in a training program to become a mate (pilot) of towing vessels or master of towing vessels (harbor assist). This license may be issued with the same limitations as noted for master and mate of towing vessels. The specific limitation is only dependent on the exam taken by the candidate.

#### b. License route endorsements and authority:

(1) Oceans

(2) Near-coastal waters

(3) Great Lakes–inland waters

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

- (4) Western Rivers
- (5) Limited Local Area
- (6) Harbor assist. This route will not be issued during the initial phase-in period; a license for a limited local area will, instead.
- (7) A license as master or mate (pilot) of towing vessels endorsed for Oceans authorizes service on oceans and on the subordinate routes of near-coastal and Great Lakes–inland waters (except Western Rivers).
- (8) A license as master or mate (pilot) of towing vessels endorsed for near-coastal waters authorizes service on near-coastal routes, Great Lakes–inland waters (except Western Rivers), without further endorsement.
- (9) A license as master or mate (pilot) of towing vessels endorsed for Great Lakes–inland routes authorizes service on Great Lakes–inland routes (except Western Rivers), without further endorsement.

c. Upgrading the Towing Licenses.

To receive an endorsement for a higher route or for Western Rivers, the mariner must obtain 90 days of observation and training, and completion of any portions of the TOAR not previously completed. He or she may also have to complete a limited examination for the area or route and should ask the local REC for more-detailed information.

d. Requirements for towing licenses:

The U.S. Coast Guard, using evaluation tools similar to the examples in enclosure (2), will evaluate each mariner. The following table provides a summary of the general requirements necessary for each towing license.

(Table on following page.)

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

<i>License</i>	<i>Total Service</i>	<i>Service</i>	<i>Time on Route</i>	<i>TOAR or Training Program required</i>	<i>Exam</i>	<i>Days of Observation for New Route</i>
<i>Master of towing vessels</i>	<i>48 mo.</i>	<i>Service as mate (pilot)</i>	<i>90 days</i>	<i>NO<sup>2</sup></i>	<i>NO<sup>2</sup></i>	<i>90 days for increase in the scope of the license.</i>
		<i>18 mos<sup>1</sup></i>				
<i>Mate (pilot) of towing vessels</i>	<i>30 mo.</i>	<i>Service as Apprentice Mate</i>	<i>90 days</i>	<i>YES</i>	<i>NO<sup>2</sup></i>	
		<i>12 mo.</i>				
<i>Apprentice Mate (Steersman)</i>	<i>18 mo.</i>	<i>Service on towing vessels</i> <i>12 mo.</i>	<i>90 days</i>	<i>NO</i>	<i>YES</i>	<i>90 days on any route</i>

1. *Up to 180 days of harbor assist can be credited.*
2. *TOAR or approved course and Limited Exam may be required if not previously completed for route.*

- e. To progress from apprentice mate (steersman) to mate (pilot) of towing vessel a mariner needs to complete either—
  - (1) an on-the-job training program documented in a TOAR [see enclosures (3 through 6)] or,
  - (2) an approved training course [see 46 CFR 10.103].
- f. The TOAR, noted in paragraph 7.e.(1) above, documents and records required assessments for progression between apprentice mate (steersman) and mate (pilot) of towing vessels. This provides the Coast Guard a consistent form of evidence to review.
- g. An approved training course is one reviewed and approved by the Coast Guard as being in compliance with the requirements of 46 CFR 10.302.
- h. A designated examiner is a person who is qualified, and approved by the Coast Guard, to evaluate whether a candidate for a license is proficient at performing specific tasks by comparing the performance of the tasks against performance standards published by the Coast Guard.
- i. Obtaining authority to operate towing vessels requires the mariner to meet the licensing requirements of 46 CFR part 10; and the manning requirements of 46 CFR 15.610, 15.805, and 15.810. This Circular guides mariners through the licensing requirements. According to 46 CFR 15.610, the mariner must hold the following evidence when operating towing vessels:

## NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

- (1) Between May 20, 2001, and May 21, 2006, and before any license transaction during this period, any of the following licenses will serve as adequate evidence on a vessel operating within any limitations on their faces (see paragraph 7.m.):
  - (a) Master of towing vessels.
  - (b) Master of towing vessels (harbor assist) or (limited) for vessels operating within the restrictions on the license.
  - (c) Operator of Uninspected Towing Vessels (OUTV).
  - (d) Master of inspected self-propelled vessels within any restrictions on the license (issued before May 21, 2001).
  - (e) Mate or first-class pilot of inspected self-propelled vessels (issued before May 21, 2001).
  - (f) Mate of inspected self-propelled vessels of greater than 200 GRT whose license was issued before May 21, 2001, may continue to serve as master of towing vessels.
  - (g) Mate (pilot) of towing vessels.
  - (h) Mate of towing vessels (limited) for vessels operating within the restrictions on the license.
  - (i) 2<sup>nd</sup>-class OUTV (may only serve as mate of towing vessels).
- (2) Any license issued or endorsed on or after May 21, 2001, must have one of the following endorsements and the appropriate evidence, as indicated, for service on towing vessels:
  - (a) Master of towing vessels.
  - (b) Master of inspected self-propelled vessels greater than 200 GRT when accompanied by a completed TOAR.
  - (c) Master of towing vessels (harbor assist) or (limited) for vessels operating within the restrictions on the license.
  - (d) Mate (pilot) of towing vessels.
  - (e) Mate of inspected self-propelled vessels greater than 200 GRT when accompanied by a completed TOAR.

## NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

- (f) Mate of towing vessels (limited) for vessels operating within the restrictions on the license.
  
- j. Obtaining an endorsement for limited local areas.
  - (1) To receive an endorsement for limited local area, the mariner must acquire 30 days of observation and training over the route, complete a TOAR, and pass a limited examination for the area or route.
  - (2) An officer licensed as mate of towing vessels may obtain the license as master of towing vessels (limited) on request if he or she—
    - (a) Submits an application;
    - (b) Holds a current license authorizing service on the route that includes the limited local area; and
    - (c) Produces evidence of 30 days of observation and training over the specific limited local area.
  
- k. Lower Mississippi River.
  - (1) Until May 21, 2001, an officer with an endorsement for Great Lakes–inland waters, Near-Coastal waters, or Oceans would serve on Western Rivers under lesser-included authority. The interim rule changed this. After May 20, 2001, an officer entering the licensing process who wishes to operate on Western Rivers must obtain an endorsement for Western Rivers.
  - (2) However, an officer of towing vessels with an endorsement for Great Lakes–inland waters, Near-Coastal waters, or Oceans may operate a towing vessel in the pilotage waters of the Lower Mississippi River if he or she meets one of the following requirements from 46 CFR 15.812(b):
    - (a) Holds a first-class pilot’s license for the route.
    - (b) If operating ‘light boat’, or a tow of uninspected barges, has made four round trips through this route, as an observer, with at least one of those trips in hours of darkness, and afterwards maintains at least one round trip within the last 5 years.
    - (c) If operating a tow of tank barges, has made 12 round trips over this route, as an observer, at least three of those trips during hours of darkness; and afterwards maintains at least one round trip within the last 5 years.

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

- (3) An officer who meets one of these requirements need not obtain an endorsement for Western Rivers on his or her license, but must maintain evidence of having completed the required experience.

1. Existing Licenses.

Towing licenses issued before May 21, 2001, will be grandfathered to master or mate (pilot) of towing vessels. Refer to the following figure from 46 CFR 10.210. (Figure located on following page.)

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

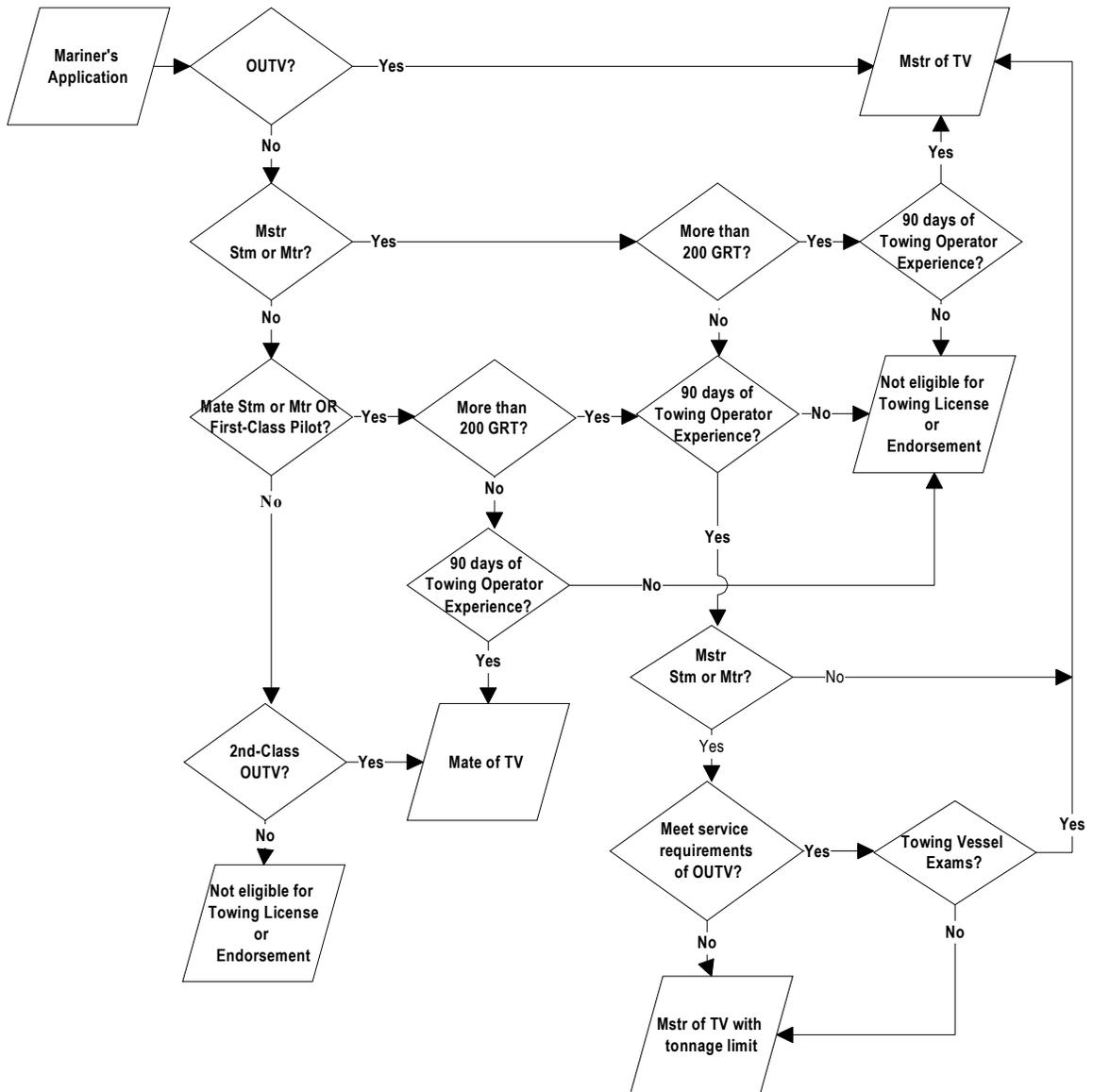


Figure10.210 ELIGIBILITY FOR TOWING LICENSE

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

- m. Manning. Generally, towing vessels are subject only to the provisions of 46 U.S.C. 8904 for licensed mariners. Seagoing towing vessels of at least 200 GRT must be operated by mariners licensed as masters and mates of inspected, self-propelled vessels with the appropriate endorsements for towing vessels, tonnages, and routes [46 CFR part 15, subpart D].
- (1) Between May 20, 2001, and May 21, 2006, any towing vessel may be under the direction and control of the following:
- (a) An officer designated to be the master holding one of the following licenses:
1. Master of towing vessel.
  2. Master of towing vessels (harbor assist) or (limited) when operating solely within a limited local area included within the restrictions on the individual's license.
  3. Operator of Uninspected Towing Vessels.
  4. Master of inspected self-propelled vessels within any restrictions on the license, while holding a completed TOAR.
  5. Master of inspected self-propelled vessels within any restrictions on the license, until its first renewal then see paragraph 7.m.(1)(c) below.
  6. Mate or first-class pilot of inspected self-propelled vessels of more than 200 GRT, until the license's first renewal; then see paragraph 7.m.(1)(c) below (Domestic service only).
- (b) Another officer holding one of the following licenses, if the vessel requires a second licensed officer:
1. A license listed in 7.m.(1)(a) above;
  2. Mate (pilot) of towing vessels (within any restrictions on the license);
  3. Mate of inspected self-propelled vessels within any restrictions on the license, while holding a completed TOAR;
  4. 2<sup>nd</sup>-Class OUTV; or
  5. Mate of inspected self-propelled vessels within any restrictions on the license, until the first renewal or upgrade of the license.

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

- (c) An officer holding a license renewed or upgraded during this period must have a towing-vessel endorsement on it for it to be valid for service on towing vessels after the date of renewal or upgrade. An officer holding a completed TOAR and a license as master or mate of inspected self-propelled vessels greater than 200 GRT does not need an endorsement.
- (2) After May 21, 2006, towing vessels must be under the direction and control of the following:
  - (a) An officer holding a license as master of towing vessels, or master of inspected self-propelled vessel greater than 200 GRT holding a completed TOAR.
  - (b) An officer holding a license as mate (pilot) of towing vessels, or a mate of inspected self-propelled vessels, greater than 200 GRT, holding a completed TOAR, if the vessel requires a second licensed officer.
- n. International Convention on Standards of Training, Certification, and Watchkeeping (STCW).
  - (1) All officers on seagoing towing vessels must satisfy STCW.
  - (2) Specific information on STCW is available in other Circulars about it or from the local REC and also on the Coast Guard Web Site at:

<http://www.uscg.mil/stcw/>

8. SAMPLE ENDORSEMENTS:

- a. *Master of Towing Vessels Upon Near-Coastal Waters; also Mate of Steam or Motor Vessels of Not More Than 500 Gross Register Tons Upon Near-Coastal Waters; also Radar Observer (Unlimited): Expires July 2002.*
- b. *Master of Towing Vessels Upon Great Lakes–Inland Waters; also Radar Observer (Unlimited): Expires June 2006.*
- c. *Master of Steam or Motor Vessels of Not More Than 100 Gross Register Tons Upon Inland Waters; also Master of Towing Vessels of Not More Than 100 Gross Register Tons Upon Great Lakes–Inland; also Radar Observer (Inland): Expires July 2006.*
- d. *Mate (Pilot) of Towing Vessels Upon Great Lakes–Inland Waters; also Apprentice Mate (Steersman) Upon Western Rivers.*
- e. *Master of Steam or Motor Vessels of Not More Than 100 Gross Register Tons Upon Inland Waters; also Mate of Steam or Motor Vessels of Not More Than 200 Gross Register Tons*

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-01

*(Domestic Tonnage), 500 Gross Tons (ITC Tonnage), Upon Near-Coastal Waters; also Mate (Pilot) of Towing Vessels Upon Great Lakes–Inland Waters; also Radar Observer (Unlimited): Expires July 2004.*

- f. *Master of Steam or Motor Vessels of Not More Than 200 Gross Register Tons (Domestic Tonnage), 500 Gross Tons (ITC Tonnage), Upon Near-Coastal Waters; also Master of Towing Vessels Upon Near-Coastal Waters; also Radar Observer (Unlimited): Expires May 2005.*
  - g. *Master of Towing Vessels (Limited) Upon the Western Rivers on the Ohio River from Mile 743.0 to Mile 747.0; Also Radar Observer – Rivers: Expires March 2006.*
  - h. *Master Steam or Motor Vessels of Not More Than 100 Gross Register Tons Upon Inland Waters; also Master of Towing Vessels (Limited) of Not More Than 100 Gross Register Tons Upon the Western Rivers on the Upper Mississippi River from Mile 282 UMR to 366 UMR and Missouri River from Mile 0 MOR to Mile 10 MOR; Also Radar Observer – Rivers: Expires March 2005.*
  - i. *Apprentice Mate (Steersman) of Towing Vessels Upon Western Rivers.*
9. QUESTIONS. A number of frequently asked questions and responses appear in enclosure (1). Direct other questions you may have regarding this guidance to any REC, or to the NMC at (202) 493-1000.



PAUL J. PLUTA  
Assistant Commandant for Marine Safety  
and Environmental Protection

- Encl:
- (1) Frequently asked questions
  - (2) Evaluation Tools for use by the Coast Guard
  - (3) Towing Officers' Assessment Record – Near-Coastal and Oceans
  - (4) Towing Officers' Assessment Record – Great Lakes–Inland.
  - (5) Towing Officers' Assessment Record – Western Rivers
  - (6) Towing Officers' Assessment Record – Limited

**NON-STANDARD DISTRIBUTION**

**B:a** Commandant G-MOC, G-MSO

**C:m** Acteur/MIO Europe; Feact/Asia; National Maritime Center

**D:l** Maritime Administration (MARAD)(2); Military Sealift Command (Code N-7CG)(2)

*This page intentionally left blank.*