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NMC Policy Letter 09-03

**AUG 26 2003**

From: Commanding Officer, U.S. Coast Guard National Maritime Center

To: Distribution

Subj: PROCEDURES TO PREVENT REDUCED PERIODS OF VALIDITY OF A  
MARINER'S CREDENTIALS AT RENEWAL

1. PURPOSE.

- a. This policy letter provides guidance to the Regional Examination Centers about procedures that will result in a mariner being able to serve under the authority of the mariner's credential for most of the period that credential is valid.
- b. The guidance in this document may assist industry and individual mariners. This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to, nor does it impose, legally-binding requirements on any party.

2. ACTION. Commanding officers of units with a Regional Examination Center (REC) shall be governed by this policy letter. Commanding officers of units with marine safety responsibilities should bring this policy letter to the attention of the maritime industry with interests in marine personnel issues. 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. BACKGROUND.

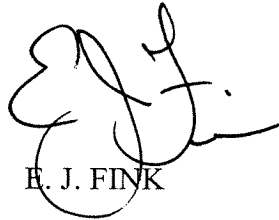
- a. A mariner renewing a credential may apply for renewal up to a year before the existing credential expires. When the renewed credential is issued, the actual date of issuance is entered thereon, and it is valid for five years from the date of issuance. When the issuance date of the new credential is dated before the expiration date of the credential being renewed, the mariner may not use the expiring credential for the full period of its validity. He or she loses the period of time measured from the date the new credential is issued to the expiration date of the expiring credential. This phenomena is commonly called "license creep." Merchant mariners' documents and certificates of registry are also subject to license creep.

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- b. Because user fees are imposed and there are other costs incidental to issuance of a credential, mariners have complained that they are being financially penalized when they do not have use of the credential for the entire five-year period of its validity. They have requested changes to correct this situation.

4. DISCUSSION.

- a. To reduce license creep to a minimum, RECs should establish a tickler file and internal procedures for the issuance and mailing of renewed credentials at a future date after the application is approved. To be eligible for this service, the mariner must request delayed issuance at the time an application for renewal is submitted.
- b. Based on workload, staffing limitations, and other resource limitations, issuance of the renewed credentials should be as close as possible to the expiration date of the renewed credentials and in no case should exceed 30 days prior to expiration of the credentials being renewed. This will result in the mariner having the use of the expiring credential for nearly all of the five-year period of validity and to receive the renewed credential before the expiring one becomes invalid for service.



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