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## Crediting Sea Service

[Sea Service Credit for Jet Skis, Kayaks, Canoes](#)

[Sea Service Credit for Mate 500/1600 Programs](#)

[Sea Service Credit for Academy Graduates](#)

[Sea Service Credit for Designated Duty Engineers \(DDE\)](#)

[Sea Service Credit for Master AGT Inland](#)

[Sea Service Credit for Mobile Offshore Drilling Units \(MODUs\)](#)

[Sea Service Credit for Vessels Which Do Not Get Underway or Only Get Underway for Limited Periods](#)

[Sea Service Credit for Dual Tonnage Vessels \(GRT/ITC\)](#)

[Sea Service Credit for Towing](#)

[Sea Service Credit for ATB and ITB](#)

[Recency Credit](#)

## **How is sea service credited for jet skis, kayaks, and canoes?**

Regulations do not specify either the minimum or the maximum vessel size for experience to qualify for deck licenses of not more than 100 gross tons, and it is not reasonable to do so by policy. Each application is evaluated on its merit. [46 Code of Federal Regulations \(CFR\) 10.201\(a\)](#) states that each applicant must satisfy the Officer in Charge, Marine Inspection (OCMI) that he or she possesses all the qualifications for the license. Experience gained entirely on large ships is not appropriate to qualify for a small tonnage license. Likewise, experience gained entirely on sail boards, kayaks, canoes, jet skis, etc., is also inappropriate. However, OCMI's may accept a limited amount of experience gained on such vessels if the applicant's overall experience demonstrates an ability to safely operate the type of small craft envisioned by the regulations.

[RETURN TO TOP](#)

## **How is sea service credited for Mate 500/1600 Programs?**

Mariners who qualified for a Mate 500/1600 GRT Near Coastal or Oceans by completing a Coast Guard approved program may raise the grade of their Mate endorsement to Master 500/1600 GRT Near Coastal or Oceans by providing the following: 360 days of service as Master/Mate while holding an endorsement as such which must include:

- At least 180 days as Master/Mate over 50GRT for Master 500 OR
- At least 180 days as Master/Mate over 100GRT for Master 1600
- 180 days of the required 360 MAY be on INLAND/GREAT LAKES

This applies to, but is not limited to, graduates of programs at Maine Maritime Academy, S.U.N.Y, PMI, and MITAGS. ([MSM Chapter 10 \(6\)](#))

[RETURN TO TOP](#)

## How is sea service credited for academy graduates?

**Academy graduates** can qualify as third mate under [46 CFR 11.407\(a\)\(2\)](#). Academy service can therefore be considered as equivalent to the sea service requirement for third mate (three years service in the deck department, six months of which is as able seaman). When an academy graduate that meets [46 CFR 11.407\(a\)\(2\)](#), applies for other deck licenses such as master 1600 or master of uninspected fishing industry vessels, his or her academy training may be credited as three years service in the deck department, six months of which is as able seaman. None of it shall be considered service as a licensed mate. OCMI's should be cautious when crediting academy training toward licenses of not more than 100 gross tons. (See [MSM, Section 10.B.9.b.](#))

**Academy Graduates, Limited Chief Engineer.** When academy graduates who are qualified as third assistant engineers under [46 CFR 11.516\(a\)\(3\)](#), apply for licenses as chief engineer (limited - oceans), chief engineer (limited - near coastal), or chief engineer of uninspected fishing industry vessels (UFIVs), they may be allowed three years sea service credit for their academy training when they have acquired one year of sea service as a licensed engineer. Two years of the credit may be considered, for evaluation purposes only, as QMED service. None of it shall be considered service as a licensed engineer.

**Academy Graduates: Designated Duty Engineer (NMT 4000 Horsepower).** When an academy graduate can demonstrate that industry specific training has been provided prior to graduation, an endorsement for designated duty engineer (DDE) -Limited-4000 hp (3000 kW) may be applied for, and added to a third assistant engineer license, without further testing. When the training program does not specify that industry specific training has been provided prior to graduation the applicant may reapply for the endorsement after completing the following:

- 60-days of sea service in any capacity in the engine room; or,
- an approved program of industry specific training following graduation.

*NOTE: An academy graduate who is applying for DDE 4,000 HP can provide 60 days of service after the issuance of the initial credential in any capacity in the engine room and be issued a DDE 4,000 HP with no further examinations.*

**Academy Graduates: Designated Duty Engineer (Unlimited).** Since persons serving under a DDE Unlimited license may be the sole engineer on board a vessel, hands-on experience as a DDE-Limited Engineer is an important supplement to their onshore training. When applying for an endorsement as designated duty engineer (DDE) -Unlimited HP (more than 4000 hp/ 3000 kW), they may be allowed, for the purpose of evaluation only, to present a written recommendation on company letterhead after six months sea service in a licensed capacity and be granted this endorsement without further examination.

*NOTE: Academy graduates who are applying for DDE Unlimited (and do not hold DDE Limited) will need to meet all service requirements and must successfully complete testing requirements for DDE Unlimited.*

[RETURN TO TOP](#)

## **What type of service is creditable as equivalent supervisory service for DDE?"**

The phrase "equivalent supervisory position" refers to service in a position as an engineer rating on vessels where engineering licenses and QMED ratings are not required (e.g., tugs, fishing vessels, etc.). ([MSM, Chapter 12 \(7\)](#))

To be creditable toward DDE, "equivalent supervisory position" service must have been as a full time engineer in an operating engine room. OCMI's may accept service on vessels less than 100 gross tons provided the vessel has a "walk in" engine room with an engineering plant comparable to vessels over 100 gross tons (e.g., electrical generators and other auxiliaries independent of the main engines). ([MSM, Chapter 12 \(8\)](#))

[RETURN TO TOP](#)

## **How is sea service credited for Master AGT Inland?**

Mariners serving on ocean or near coastal waters are authorized to serve on inland waters. Therefore, a mariner who holds Master 1600 Ocean/Near Coastal may use ocean or near coastal service to apply for Master AGT Inland. ([MSM, Chapter 10, Sec. C 3.](#)) [46 CFR 11.435\(b\)](#) does not specifically require inland service for Master AGT Inland.

*NOTE: Does not apply to [46 CFR 11.433](#) Great Lakes and Inland.*

[RETURN TO TOP](#)

## How is sea service credited for Mobile Offshore Drilling Units (MODUs)?

- Service

Service aboard self-propelled, dynamically positioned MODUs, which are not anchored or otherwise bottom bearing, will be credited without restriction toward all grades of unlimited deck licenses in the same manner as conventional vessels. All other MODU service will be credited in accordance with [46 CFR 11.211\(c\)](#). ([MSM Vol III, Chapter 10, Section B\(5\)](#))

- Licenses

Holders of licenses as master, oceans, any gross tons do not have to take any additional examinations when obtaining an endorsement as offshore installation manager (OIM). Holders of such master licenses must however, meet the sea service requirements for the OIM endorsement and complete the required Coast Guard approved training courses. ([MSM, Chapter 10 \(H\)](#)), and [46 CFR 11.470, 11.903\(b\) \(1\)](#))

Service on mobile offshore drilling units is creditable for raise of grade of officer endorsement. Evidence of one year's service as mate or equivalent while holding a license as third mate, or as engineering officer of the watch or equivalent while holding an officer endorsement or license as third assistant engineer, is acceptable for a raise of grade to second mate or second assistant engineer, respectively; however, any subsequent raises of grade of unlimited, non-restricted officer licenses or endorsements must include a minimum of six months of service on conventional vessels. ([46 CFR 11.211\(c\)](#))

- Able Seaman MODU

Experience in the deck department of a mobile offshore unit (MOU) is creditable toward able seaman endorsements even if the rig is temporarily bottom bearing.

The following are considered deck department positions: roustabouts, roughneck, tool pusher, rig superintendent, driller, derrick man, and crane operator. In some cases a barge engineer on a moveable rig is part of the deck department.

Companies must be contacted and a letter provided verifying the applicant's deck department service in each case. Welders are not part of the deck department and their service is not creditable toward AB. ([MSM Vol.III, Chapter 16 Section 3.b.5](#))

*NOTE - If all service is on MODUs, mariners will receive AB MODU endorsement unless service is as one of the positions listed above.*

[RETURN TO TOP](#)

## **How is sea service credited for vessels that do not get underway or only get underway for limited periods?**

[Policy Letter 09-01](#) gives guidance on crediting service for vessels that do not get underway or get underway for limited periods. Policy Letter 09-01 speaks to specific vessels and credit will **ONLY BE GIVEN TO VESSEL TYPES LISTED IN THE POLICY LETTER**. See the Policy Letter for crediting of service on the following vessels:

- Dockside Casino Vessels
- Commercial Vessels Operating in an Artificial Impoundment
- Lift boats – the service must indicate the number of days that a vessel is in the “liftboat” status and days that the vessel is underway
- Vessels in a Semi-Operational Status - This includes vessels such as oil spill response vessels, anchored (extended-period) pre-positioned ready reserve vessels, and other vessels moored and in a semi-operational or “on-call” status, which are maintained, manned, and operated to facilitate a rapid deployment
- Reduced Operating Status(ROS) Vessels
- Oil Spill Response Barges (OSRBs)

[RETURN TO TOP](#)

## How is sea service credited for dual tonnage vessels (GRT/ITC)?

[Policy Letter 11-12](#) refers only to vessels measured in both conventional and regulatory measurement systems i.e., Dual Tonnage.

- It applies to vessels that have both measurements, Gross Registered Tons (GRT) & Gross Tons (International Tonnage Convention) [GT (ITC)], in Marine Information for Safety and Law Enforcement (MISLE)-
  - 200 GRT = 500 GT (ITC)
  - 1600 GRT = 3,000 GT (ITC)

If a vessel only has ITC tonnage, then the ITC tonnage will be credited as Gross Registered Tons and the guidance in this policy letter would not apply. (In other words, vessel tonnage is listed as 2300 ITC and has no GRT listed, then the mariner would be credited with service on a vessel of 2300 GRT.)

[RETURN TO TOP](#)

## How is sea service credited for Towing?

For every towing vessel of at least 8 meters (at least 26 feet) in length, a mariner must hold a MMC as Master or Mate/(Pilot) of Towing in order to serve in that capacity. If a mariner submits sea service acting in the capacity of Master or Mate (Pilot) and he or she does not hold the credential, then the service will be considered as outside the scope of his or her experience and he or she will not receive credit for this service. ([46 CFR 15.610 \(a\)](#))

If a mariner is a Master Steam/Motor over 200 GRT, he or she may operate towing vessels within any restrictions on his or her license, **AFTER** 30 days of training and observation on towing vessels on a particular route (90 days for Western Rivers), and either hold a completed Towing Officers Assessment Record (TOAR) or complete an approved course. ([46 CFR 11.464 \(f\)](#))

If a mariner is a Mate Steam/Motor or First Class Pilot he or she may operate towing vessels within any restrictions on his or her license **AFTER** 30 days of training and observation on towing vessels on a particular route (90 days for Western Rivers) and either hold a completed TOAR or complete an approved course. ([46 CFR 11.465 \(d\)](#))

To operate as Master or Mate of Towing Vessels on Western Rivers, the credential must have Towing Vessels of Western Rivers endorsed on it. ([46 CFR 11.464\(d\)](#) and [46 CFR 11.465\(b\)](#)).

**Offshore Supply Vessels (OSVs)** - when classified as Anchor Handling Tug and Supply Vessels (AHTS) - will only be evaluated toward towing service if the vessel is operated as a towing vessel. Applicants must hold the appropriate credential to use service as such. Sea service letter must document time while towing. ([NVIC 04-01](#))

[RETURN TO TOP](#)

## How is sea service credited for Articulated Tug and Barge (ATB) and Integrated Tug and Barge (ITB)?

When evaluating mariner applications for original issue or a raise in grade of an officer endorsement, service on ATBs should be considered the same as service on a dual-mode ITB and credited in accordance with [46 CFR 11.211\(d\)](#).

If the aggregate tonnage of the tug and barge is over 1600 gross registered tons (GRT), service is creditable on a two for one basis (two days experience equals one day of creditable service) for up to 50% of the total service on vessels over 1600 GRT required for an unlimited tonnage license. This guidance applies without regard to whether the ATB was engaged in towing astern or pushing ahead at the time of service.

*NOTE: **Aggregate tonnage** means total tonnage of the tug and the barge because they are serving as one unit. **Example:** A mariner wanting a raise in grade from 3<sup>rd</sup> Mate to 2<sup>nd</sup> Mate using time on Dual Mode ITBs can be credited on a 2 for 1 basis for up to 90 days to meet half of the requirement of service needed over 1600GRT. If a mariner submits all time on Push Mode ITBs, time can be credited as equivalent to a conventional vessel.*

- All Service letters must have vessel information, numbers, and routes for each vessel listed.
- If the vessel information is not on the letter, then it must be requested for BOTH the Tow and the Barge using an Awaiting Information letter.
- ATB service will only be credited as a dual mode ITB using [46 CFR 11.211 \(d\)](#).
- For Dual mode ITBs or ATBs, the level of officer endorsement required for manning purposes is based on the tonnage of the towing unit, not the combined tonnage. Applicants must hold either Master or Mate of towing, or an inspected officer endorsement of equivalent tonnage and route authorities

**Offshore Supply Vessels (OSVs)** - when classified as Anchor Handling Tug and Supply Vessels (AHTS) - will only be evaluated toward towing service if the vessel is operated as a towing vessel. Applicants must hold the appropriate credential to use service as such. Sea service letter must document time while towing. ([NVIC 04-01](#))

Towing Vessels and AHTSs if engaged in the offshore mineral and oil industry were exempt from the requirement to be operated by a master/mate of towing vessels as required by [46 USC 8904](#) and USC 8905. This exemption was removed in the C.G. Authorization Act of 2010. Service on Towing Vessels and AHTSs engaged in the offshore mineral and oil industry should be evaluated as follows:

- Service earned prior to October 15, 2010: Title 46 USC 8904 does not apply; therefore a credential authorizing service on towing vessel is not required.
- Service earned after October 15, 2010: Title 46 USC 8904 applies and service should only be credited if the mariner held an appropriate credential authorizing service on towing vessels.

[RETURN TO TOP](#)

## Recency Credit

- Recency is required for ALL original and Raise of Grade officer endorsements.
- There is no minimum tonnage required for deck officer endorsements to 200 GRT.

*NOTE: If all service is under 5GRT, mariner will be limited to 25GRT.*

- Recency is NOT required for renewals.
- Recency is required for towing officer endorsements, but the 90 days can be on any type or tonnage vessel in the last 3 years.
- An applicant for any officer endorsement must have at least 3 months of qualifying service on vessels of appropriate tonnage or horsepower within the 3 years immediately preceding the date of application.
- Recency is required for Master or Mate 500 applicants; all 90 days must be on vessels > 50 GRT
- Recency required for Master or Mate 1600 applicants; all 90 days must be on vessels > 100 GRT
- Recency and unlimited tonnage for deck officers:
  - All 90 days must be on vessels > 200 GRT, and
  - At least 45 days must be on vessels > 1600 GRT.
  - If recency requirements are not met, a tonnage limitation must be calculated.
- Recency and unlimited horsepower for engineer officers (Except DDEs):
  - All 90 days must be on vessels of 4,000 HP or more.
  - If recency requirements are not met, a horsepower limitation must be calculated.

[RETURN TO TOP](#)