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CG-MMC Policy Letter
No. 02-24

From: M. Medina
COMDT (CG-MMC)

To: National Maritime Center

Subj: Temporary Reduction in Service Requirements for Certain Deck Ratings

Ref: (a) Title 46, U.S.C. Sections 7307-7309
(b) Title 46 Code of Federal Regulations (CFR) 12.403

1. PURPOSE. This policy letter provides guidance on implementing section 3534(j) of the National Defense Authorization Act (NDAA) of 2024, (Pub. Law 118-31), which temporarily reduced sea service requirements contained in references (a) and (b) for certain deck rating endorsements.
2. ACTION. The Coast Guard will use this policy when evaluating applications for a merchant mariner credential (MMC) with a national endorsement as able seaman-unlimited, able seaman-limited, and able seaman-special during the period the temporary reductions in reference (a) are in effect.
3. DIRECTIVES AFFECTED. The Marine Safety Manual, Vol III, Marine Industry Personnel, COMDTINST 16000.8B, section A-16.C.2 is temporarily revised in accordance with the temporarily reduced service requirements discussed in paragraph 4.a below.
4. BACKGROUND.
 - a. Section 3534(j)(1)-(3) of the NDAA of 2024 temporarily reduces the sea service requirements for able seaman deck rating endorsements as indicated in 5.a. below:
 - b. This temporary reduction is effective until December 22, 2026.
5. DISCUSSION. The Coast Guard will review MMC applications for Able Seaman—Unlimited, Able Seaman—Limited, and Able Seaman—Special in accordance with the temporarily reduced service requirements found in reference (a) and outlined in paragraph 4.a above.
 - a. Temporary reduction in Service Requirement: The minimum service required to qualify for the Able Seaman endorsements is as follows:
 - i. Able Seaman-Unlimited: 18 months of service on deck on vessels operating on oceans or on the Great Lakes.

- ii. Able seaman-Limited: 12 months of service on deck on vessels of 100 GRT or more.
 - iii. Able Seaman-Special: 6 months of service on deck on vessels on vessels operating on oceans or the navigable waters of the United States.
- b. Applications in current inventory. The temporarily reduced service requirements shall be applied to all applications that have not reached final agency action. A new application will be required if the MMC has already been issued or if the application has been closed.
 - c. Applications received before December 22, 2026. Applicants will not be penalized for the time required to process applications. If the application is received prior to December 22, 2026, the applicant will receive the benefit of the temporarily reduced sea service requirements.
 - d. Crediting service for approved training. Sea service credit for approved training will be in accordance with the Coast Guard issued approval per 46 CFR Part 10, subpart D. Further guidance will be provided regarding course and program approvals through an update to MMC Policy Letter 04-23 Sea Service Credit for Able Seaman Courses of Instruction.
 - e. STCW Endorsements. The service requirements for STCW endorsements remain the same.
 - f. Amending applications. Applicants for Able Seaman—Limited, and Able Seaman-Special may amend their applications if based on the temporarily reduced sea service requirements they qualify for a higher endorsement. The Coast Guard will evaluate an application for the higher endorsement without requiring the applicant to request an amendment.
 - g. Extension of Service Requirement Reduction. If the applicability of section 3534(j) of the NDAA of 2024 is extended beyond December 22, 2026, this policy letter will remain in effect until subsequent lapse of the authority to reduce service requirements or separate cancellation of this policy letter.
6. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a regulation. It is not intended to, nor does it impose legally binding requirements on any party. This guidance represents the Coast Guard’s current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other Federal and State regulators, in applying statutory and regulatory requirements. Alternative approaches for fulfilling this policy may be acceptable if the approach satisfies the requirements of the applicable statutes and regulations.
7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.
- a. The development of this guidance and the general policies contained within it have been thoroughly reviewed by the originating office in conjunction with the Office of Standards Evaluation and Development, Commandant (CG-REG). Pursuant to Department of Homeland Security Directive 023-01, Rev.1, associated implementing instructions, and Environmental Planning COMDTINST 5090.1 (series), which guide the Coast Guard in complying with the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4370f), we have determined that this action is categorically excluded (CE) from further environmental analysis under paragraphs

#A3, #L5 and #L56 in Appendix A, of Table 1 of DHS Directive Instruction Manual 023-01, Rev. 1. Our rationale for selecting these CEs is as follows. “Promulgation of rules, issuance of rulings or interpretations, and the development and publication of policies ... and other guidance ... that implement, without substantive change, statutory or regulatory requirements” or “...that interpret or amend and existing regulation without changing its environmental effect “ are covered under DHS CE #A3. Promulgation of this policy and its associated guidance implements, without substantive change, the applicable Commandant Instruction or other federal agency regulations, procedures, manuals, and other guidance documents. Accordingly, Coast Guard CE #L5 applies. In addition, the policy letter includes elements that pertain to training, qualifying, licensing and disciplining maritime personnel. These latter aspects of the policy letter and its associated guidance are covered under Coast Guard CE #L56.

- b. This guidance will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policies in this guidance must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.
8. REQUEST FOR CHANGES. All requests for changes and questions regarding implementation of this policy and/or requests for changes should be directed to the Office of Merchant Mariner Credentialing (CG-MMC), at (202) 372-2357 or MMCPolicy@uscg.mil.

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