

**MEMORANDUM OF UNDERSTANDING BETWEEN
UNITED STATES MARITIME ADMINISTRATION
AND
COAST GUARD
REGARDING INSPECTION AND CERTIFICATION OF
MARITIME ADMINISTRATION VESSELS**

I. PARTIES

The parties to this Memorandum of Understanding (MOU) are the Maritime Administration (MARAD) and United States Coast Guard (USCG).

II. AUTHORITY

This MOU is authorized under the statutory and regulatory provisions of Titles 14, Coast Guard and 46, Shipping of the United States Code (USC); the governing sections include the following:

- a. 14 USC Section 504 – Commandant; general powers.
- b. 14 USC Section 701 - Cooperation with other agencies, States, territories, and political subdivisions.
- c. 46 USC Section 2109 – Public vessels.
- d. 46 USC Section 3301 – Vessels Subject to Inspection.
- e. 46 USC Section 3309 – Certificate of Inspection.
- f. 46 USC Section 57100 – National Defense Reserve Fleet.
- g. 46 U.S.C. Section 57101 – Requiring vessels in MARAD custody go into NDRF
- h. 46 USC Section 3316 – Classification Societies
- i. 46 USC Section 3306(d)
- j. 46 USC Section 51504 – Use of Training Ships
- k. 46 USC Chapter 513 - United States Merchant Marine Academy
- l. 46 USC Section 51103 – Instructional Purpose Loan Authority of Secretary of Transportation
- m. 40 USC Section 548 – MARAD federal government disposal agent for surplus vessels
- n. 46 CFR Part 167 – Coast Guard Regulations Public Nautical Schools
- o. Navigation and Vessel Inspection Circular No. 02-95, as amended
- p. 49 C.F.R. § 1.93 – Delegation of Secretary of Transportation’s authority to MARAD.

III. PURPOSE:

The purpose of this MOU is to set forth the process by which MARAD and the USCG plan to collaborate and develop an understanding of relationships and responsibilities between the parties for the inspection, operation, and certification of MARAD’s National Defense Reserve

Fleet (NDRF). The NDRF includes Ready Reserve Force (RRF) vessels, vessels primarily used for training (Public Nautical Ship (PNSS) AKA School Ships), Unique Purpose vessels, and other vessels. The vessels covered by this MOU shall be those vessels set forth in the Annex IV hereto. MARAD may unilaterally add, subtract, and amend in Annex IV and shall promptly provide such amendments to the USCG Point of Contract (POC) in writing. Annex IV does include all NDRF vessels.

NDRF vessels in the RRF are maintained in either Reduced Operating Status (ROS) or Inactive Status as reserve sealift assets for national defense and other non-commercial maritime purposes.

This MOU identifies and describes issues associated with different categories of NDRF vessel, giving particular attention to those conditions that differ from the standard inspection, certification and classification requirements of active, commercial vessels. This MOU describes a process which permits flexibility to align inspections with periods of maintenance and operation versus adhering to set periodic intervals prescribed for vessels in continuous operation. This approach optimizes the use of Coast Guard and MARAD resources while achieving an equivalent level of safety.

The following annexes are included in this MOU:

- a. Annex I – Glossary
- b. Annex II – Command, Control, and Communications
- c. Annex III – Exemptions, Equivalencies and Alternative Procedures
- d. Annex IV – List of MARAD Vessels (includes RRF, Public Nautical School Ship, Unique Purpose, Bareboat Chartered, etc.)

IV. DISCUSSION

The NDRF was established by 46 USC 57100: National Defense Reserve Fleet - U.S. Code. All vessels in the custody of MARAD shall be placed in the NDRF as per 46 U.S.C. § 57101(a).

The RRF was established in 1976 as a surge component of MARAD's NDRF. Today, the RRF is a key element of the Department of Defense's (DOD) strategic sealift capability that provides reliable and responsive shipping to support the deployment of U.S. military forces worldwide. RRF vessels are maintained in a high state of readiness and provide for rapid availability of U.S. Government equipment, supplies, and deployment of personnel via worldwide shipping in support of global military defense operations and disaster relief. MARAD is responsible for ensuring that RRF vessels can be activated and transitioned to their fully operational status within assigned Readiness Statuses (R-Status 4, 5, 10, 20 or 30 days) to meet and perform mission requirements. For DOD specific operations, RRF vessels may shift to Operational Control (OPCON) by the Navy's Military Sealift Command. RRF and other NDRF vessels may also be under the OPCON of MARAD or other federal, state, or private entities (as is the case with the School Ships). Irrespective of operational control, MARAD retains administrative control for the inspection, certification, and maintenance of all NDRF vessels.

Public Nautical School Ships (PNSS) are not part of the RRF. There are six PNSS loaned to the State Maritime Academies (SME) (California Maritime Academy, State University of New York Maritime College, Texas Maritime Academy, Great Lakes Maritime Academy, Maine Maritime

Academy and Massachusetts Maritime Academy). These ships are operated by each SME. However, MARAD may operate a PNSS or let one SME operate a PNSS previously loaned to another SME.

One vessel, the FREEDOM STAR is on loan for training purposes and operated by the Seafarers International Union's Harry Lundeberg School of Seamanship. Additionally, the United States Merchant Marine Academy at Kings Point operates a ship under this program.

MARAD retains administrative responsibility for the accomplishment of inspections, certifications, classifications, documentations, and major repairs for all NDRF vessels, including the PNSS. Where other entities have operating control of NDRF vessels, such entities have the corresponding responsibility to cooperate with MARAD to accomplish the above.

Under a MOU with the American Bureau of Shipping (ABS), MARAD recognizes ABS as the organization with which MARAD will work with on the classification of NDRF vessels as inspections, certifications, documentations, and major repairs. ABS will be the principal team member surveying U.S. sealift assets for fitness for intended purposes. MARAD intends to class all NDRF vessels identified in Annex IV, including RRF, PNSS, and Unique Purpose Ships. Those classification services within the scope of ABS's expertise will be obtained from ABS. ABS has agreed to cooperate with MARAD and provide its services in a manner that will ensure that MARAD meets its programmatic objectives in terms of readiness, vessel performance, and compliance with USCG regulations. (See section VI of this MOU for further information regarding ABS authorization for USCG inspection activities under the Alternate Compliance Program)

PUBLIC VESSEL DESIGNATION AND DOCUMENTATION:

All NDRF vessels are legally designated as public vessels under 46 U.S.C. § 57100(a), and 46 U.S.C. § 2109 applies Subtitle II of Title 46 to MARAD vessels. Subtitle II of Title 46 concerns the laws relating to the Inspection and Regulation of Vessels.

MARAD intends to have all NDRF vessels identified in Annex IV fully documented, excluding PNSS listed in Annex IV, which are excepted from documentation as PNSS. The National Security Multi-Mission Vessels (NSMV) will, upon delivery and upon satisfaction of all documentation requirements, be documented by the USCG's National Vessel Documentation Center with Certificates of Documentation validating ownership, nationality (i.e., flag), official number assigned, and home port.

All NDRF vessels identified in Annex IV will display key documents on the navigation bridge

V. RESPONSIBILITIES:

A. RRF PROGRAM MANAGEMENT:

- (1) Program Phases: To meet readiness requirements established for the RRF, MARAD has two phases for management, which consist of:
 - (a) Phase M for Maintenance
 - (b) Phase O for Operations
- (2) Expanded definitions are included in Annex I and Section VI. below.

B. READINESS STATUS:

At the direction of the United States Transportation Command (USTRANSCOM), RRF vessels are maintained in one of several degrees of readiness, designated as either ROS 4/5/10 or RRF 10/20/30. ROS 4/5/10 vessels are partially crewed with USCG credentialed mariners with hotel systems operational. ROS crews perform inspections, routine repairs, and preventive maintenance, and periodically operate equipment and systems. RRF 10/20/30 vessels are unmanned and maintained in a state of deep laid-up, at one of MARAD's three NDRF fleet locations. In this condition, equipment and systems are preserved, critical spaces dehumidified, and sea chests are blanked to prevent deterioration in lay-up status. RRF 10/20/30 vessels will not receive a COI until inspection is completed upon activation.

C. ACTIVATIONS / DEACTIVATIONS:

RRF vessels may be activated for a variety of purposes.¹ Principally, activations are initiated for maintenance, readiness testing or to support a DOD mission or exercise. There are four types of activations:

1. "No-Notice" Activation. This is an activation with little or no pre-emptive warning that it will occur. During "No-Notice" activations, vessels are activated in accordance with their assigned readiness criteria. The pace is generally accelerated, and meeting activation timeframes is critical to the success of the activation. There are two sub-categories of "No-Notice" activations:
 - i. "No-Notice Mission" Activation is a DOD or MARAD directed activation to support a contingency or operation.
 - ii. "No-Notice Turbo" Activation is a USTRANSCOM initiated test of surge sealift vessels to validate the ability of the vessel to activate within the designated R-status period and be prepared to receive cargo or perform mission operations ("Ready for Tender").
 - iii. ABS is to be provided copies of the results of turbo activations with respect to issues in Class related equipment or equipment related to statutory certificates issued and Class related service delivery.
2. "Notice Mission" Activation. This is the same as a No-Notice Mission activation with the exception that the ship manager will be provided a specific date to have the vessel Ready for Tender. Typically, the activation period will be in excess of the designated R-status requirement for a Notice Mission Activation. Notice Mission activations usually support a planned DOD exercise.
3. "Maintenance" Activation and Sea Trial. The maintenance activation and sea trial are utilized for the purpose of exercising and validating equipment and installations not operated or only capable of limited testing during reduced operating or lay-up status. "Maintenance" activations are strictly for maintenance purposes as shown in Table 1.

¹ For USCG Inspections at Activation see Section VI of this MOU.

4. "Other" Activation. The vessel may be activated for other reasons such as sailing in lieu of towing to a shipyard for drydocking or to validate or complete maintenance activities.

Notice Mission, Maintenance and Other activations are scheduled in advance. The pace is generally slower than No-Notice activations, and the activation timeframes are often not critical.

All ROS/RRF vessels are to follow the requirements of the USCG/ABS agreed procedures as amended, for periodic audit and implementation of ISM certificates.

Following activation and any subsequent operation, the vessel is returned to either ROS 5/10 or RRF 10/20/30 status through deactivation. The deactivation process is frequently used as an opportunity to make repairs and schedule inspections or surveys.

D. USCG NOTIFICATION:

The Maritime Administration HQ will notify the USCG Commandant, Office of Commercial Vessel Compliance (CG-CVC-4) when an activation occurs, identifying the vessel, Ship Manager or General Agent as applicable, the activation location, and the vessel readiness status. Notification on the local level will be made as part of any request for inspection, if necessary. The scope of the USCG inspection at activation is defined in accordance with Section VI.E. MARAD will provide advance notification (as required by 46 CFR Parts 31.01-15 & 91.25-5) to the Officer in Charge, Marine Inspections (OCMI) to facilitate the scheduling of requested inspections for all notice activations. MARAD may request additional USCG support to ensure all activation timelines are met in the event of a large-scale activation

E. SHIP MANAGEMENT SERVICES:

The day-to-day management of RRF vessels is assigned to commercial ship management companies under either a Ship Manager Contract or General Agency task order. General Agency tasks are temporary, but the responsibilities of a General Agent are the same as that of a Ship Manager. Primary oversight of Ship Managers is provided by MARAD Area Divisions to which the vessel is assigned.

Ship Managers manage all aspects of RRF vessel maintenance and operations, including the hiring of the crew. Ship Managers are contractually responsible for maintaining RRF vessels in class and certification and are responsible for their overall material condition and readiness. The Ship Manager is responsible for requesting USCG inspections, with the Port Engineer designated as the primary Point-of-Contact for requested vessel inspections.

F. RRF MAINTENANCE PROGRAM:

The level of maintenance on RRF vessels is based on the readiness criteria described in Table 1: RRF Maintenance Frequencies. The RRF Preventative Maintenance Program (PMP) includes Planned Maintenance (PM), Condition Monitoring (CM) and planned activations culminating in dock or sea trials. The frequency of maintenance actions and the type of activation trial is dependent on assigned readiness.

These are notional minimum requirements and frequency may be increased if necessary.

Table 1: RRF Maintenance Frequencies

R-Status	Outported	ROS Crew	Maintenance Activation w/Dock Trial	Maintenance Activation w/Sea Trial	Preventive Maintenance Cycle
ROS-4/5	Yes (3)	Yes	As needed (1)	Twice in 5 yrs (2)	Continuous
RRF-10	No (4)	No (4)	none	Twice in 5 yrs (2)	6 mo
RRF-20	No	No	none	Once in 5 yrs	6 mo
RRF-30	No	No	none	none	1 yr

Notes:

- (1) Dock trials to be scheduled in non-sea trial fiscal years. These dock trials can be used to support regulatory requirements.
- (2) Sea Trials twice in 5 years (One Post Drydock and One Intermediate).
- (3) Generally located at strategic outports but may be located at NDRF sites.
- (4) Generally located at NDRF sites without crews, however some may be sited at out-port locations with retention crews.

Table 2: RRF Maintenance Frequencies

<i><u>Maintenance Category/R-Status</u></i>	<i><u>ROS-5/10</u></i>	<i><u>RRF-10</u></i>	<i><u>RRF-20</u></i>	<i><u>RRF-30</u></i>
<i>Outported</i>	Yes ⁽³⁾	No ⁽⁴⁾	No	No
<i>ROS Crew</i>	Yes	No ⁽⁵⁾	No	No
<i>Maintenance Activation w/Dock Trial</i>	Annual ⁽¹⁾	None	None	None
<i>Maintenance Activation w/Sea Trial</i>	Twice in 5 years ⁽²⁾	Twice in 5 years ⁽²⁾	Once in 5 years	Once in 5 years
<i>Planned Maintenance Cycle</i>	Continuous	6 months	1 year	1 year
<i>Vibration Analysis</i>	Twice in 5 years ⁽²⁾	Twice in 5 years ⁽²⁾	Once in 5 years	Once in 5 years
<i>Main Diesel Engine Analysis</i>	Twice in 5 years ⁽²⁾	Twice in 5 years ⁽²⁾	Once in 5 years	Once in 5 years
<i>Lube Oil Analysis ⁽⁷⁾</i>	6 months	6 months	At activation ⁽⁶⁾	At activation ⁽⁶⁾
<i>Diesel Engine crankshaft deflection</i>	Annual ⁽¹⁾	Twice in 5 years ⁽²⁾	Once in 5 years	Once in 5 years
<i>Cylinder Drain Lube Oil Analysis</i>	Twice in 5 years ⁽²⁾	Twice in 5 years ⁽²⁾	Once in 5 years	Once in 5 years
<i>Infrared Photographic Thermography</i>	Twice in 5 years ⁽²⁾	Twice in 5 years ⁽²⁾	Once in 5 years	Once in 5 years

<i>Maintenance Category/R-Status</i>	<i>ROS-5/10</i>	<i>RRF-10</i>	<i>RRF-20</i>	<i>RRF-30</i>
<i>Insulation Resistance (Low Voltage) and Megger Test (High Voltage)</i>	Annual	Annual	Once in 5 years	Once in 5 years
<i>Diesel Engine Scavenge Port Inspection (2 stroke propulsion engines only)</i>	Twice in 5 years ⁽²⁾	Twice in 5 years ⁽²⁾	Once in 5 years	Once in 5 years

Notes:

- (1) Dock trials to be scheduled in non-sea trial fiscal years. These dock trials can be used to support regulatory requirements.
- (2) Sea Trials twice in 5 years (One Post Drydock and One Intermediate).
- (3) Usually out ported, some may be located at NDRF sites.
- (4) Usually located at NDRF sites, some may be sited at outport locations.
- (5) Usually without crew, some vessels may have a small retention crew.
- (6) MARAD may elect to do some equipment, e.g., stern tube, more frequently.
- (7) Vessels in FOS shall perform LO analysis on a quarterly basis.

Maintenance activations are carried out to conduct operational tests of equipment and systems. Dock trials involve activation of the vessel’s machinery plant, but the vessel is not taken to sea. Regulatory inspections and surveys, including COI renewal and mid-period inspections, are scheduled to coincide with dock and sea trials whenever possible. In the case of RRF-20/30 vessels this may result in periodic expiration of COIs. Below is how the parties will address the expiration of a COI on an RRF-10/20/30 vessel.

MARAD employs modern maintenance concepts that are industry recognized in the management of the RRF vessels. MARAD, along with the vessel’s Ship Manager, will assess and determine the best method forward in conducting repairs and determine if any replacement of machinery or parts is a more efficient and reliable option. These maintenance concepts are designed to enhance the efficiency and the quality of repairs in the fleet as detailed:

- a. **Run-To-Failure (Corrective) Maintenance:** Defined as repairing or replacing a broke, worn or failing part or unit when professionally assessed that this would be the best value to do so.
- b. **Preventative Maintenance:** Preventative Maintenance Procedures (PMP) are designed to ensure ship specific systematic exercising, maintenance, inspection and testing of ship systems and equipment. Preventative maintenance of equipment and machinery is performed on a cyclical basis, at intervals shown above. The maintenance plan for each vessel is maintained onboard within the NSE NS database.
- c. **Condition-based Maintenance:** This proactive maintenance method is enhanced by MARAD ship maintenance processes including engine diagnostics and performance testing, lube oil analysis, thermography and vibration readings, fuel oil testing and water chemistry surveillance. Additionally, MARAD employs the

services of steel gauging contractors to identify hull, structural and tank steel requirements in advance of regulatory inspections and scheduled repair periods.

RRF vessels shall be maintained using preventative maintenance techniques. Therefore, classification of the vessels shall be maintained using approved PM and CM schemes in accordance with the latest version of the “ABS Rules, MVR 7-A1-14, Surveys Based on Preventative Maintenance Techniques,” with modified frequencies as listed in Table 1 – RRF Maintenance Frequencies. MARAD intends to enroll most ROS 5/10 vessels and may enroll RRF 10/20/30 vessels in the ABS PMP. MARAD will determine which RRF vessels will enroll in PMP (PM and/or CM) and its Ship Manager/General Agent will submit the enrollment request to ABS.

VI. INSPECTION REQUIREMENTS

A. GENERAL:

All vessels owned or operated by MARAD will comply with vessel inspection regulations and obtain a COI. The Maritime Administration intends that RRF vessels will proceed to sea with a valid USCG COI indicating the vessel complies with the applicable USCG rules and regulations. COIs on ROS 4/5/10 vessels will be maintained; COIs on RRF-10/20/30 vessels may expire but will be renewed at activation (see Section VI E). Inspection intervals will be in accordance with 46 CFR Parts 31 and 91(Inspection and Certification) schedules unless specifically modified below.

B. ALTERNATE COMPLIANCE PROGRAM:

RRF vessels are required by law to comply with COI requirements but may do so via the USCG’s Alternate Compliance Program (ACP). RRF vessels will normally achieve the COI requirements via the ACP.

ACP is a voluntary program and enrollment in the program includes compliance with the rules of the American Bureau of Shipping (although there are other class societies authorized by the Coast Guard for ACP, MARAD uses ABS only for classification services) and the regulations of the International Maritime Organization. Under the ACP, the USCG will accept surveys performed by ABS as equivalent to tests and examinations required for initial and in-service inspections for certification, periodic re-examination, and drydock examinations. Vessels enrolled in ACP will obtain Statement of Voluntary Compliance (SOVC) for the IMO mandatory instruments that would be applicable to commercial vessels of similar size, service, and route.

MARAD may request that RRF vessels enrolled in ACP have systems or equipment onboard that meet acceptable US government or military standards but are not certified as meeting SOLAS requirements. Those items will be documented through correspondence between MARAD and CVC-4 and will be retained onboard. This change will be noted in both USCG and ABS electronic vessel inspection records. It is expected that only SOLAS approved items will be utilized as required for vessels voluntarily enrolled in ACP otherwise.

C. Certification of Inspection (COI):

Retention of a valid COI does not preclude the existence of deficiencies that need correction but are not deemed by the OCMI to be sufficiently serious to withhold the COI. National security considerations may make it necessary for a vessel to get underway without compliance with

some specific requirements that would be considered for Flag State Detention and documented through a Form CG-835V. In such cases, a request for a National Defense Waiver (NDW) will be directed to Commandant (CG-CVC). (See Section X below for process))

RRF vessel inspection requirements will vary based on their assigned program management phase. While vessels are in Phase M, they will comply with requirements set out in this MOU. Vessels that are in Phase O will comply with all applicable federal regulations, like commercial vessels. Selected RRF vessels maybe modified for a specific military function. Such modifications are performed in accordance with all applicable rules and regulations, except for military equipment and/or system installations. Military equipment/system inspection requirements will be developed on a case-by-case basis and are to be entered into the USCG's Marine Information for Safety and Law Enforcement (MISLE) database.

Routine management of the RRF will be conducted with ships in Phases M and O. The following discussion considers these Phases only.

Phase M - Maintenance: RRF vessels in lay-up, whether inactive or in ROS status, are assigned to Phase M. Phase M maintenance activations and cycles are based on a vessel's assigned readiness status and are shown in Table 1. Vessels remain in phase M when conducting maintenance and test exercise activations and associated sea trials.

Phase O - Operation: During Phase O, inspection intervals will be in accordance with 46 CFR Parts 31 and 91 requirements. RRF vessels, whether in inactive RRF status or in active ROS status, are assigned to Phase O when they are operating for a mission or a test activation. During Phase O, survey intervals will be in accordance with ABS Rules.

RRF Recapitalization: To remove older vessels overdue for recapitalization or at the end of RRF service and to increase the safety of the fleet, DOT/MARAD will recapitalize the NDRF vessels assigned to the RRF beginning in FY2022 in coordination with the DOD. This action includes procurement of previously owned vessels, which may be foreign built. Successive National Defense Authorization Act (NDAA) has indicated requirements to consider vessels enrolled in the Maritime Security Program (MSP). Accordingly, MARAD will consider MSP vessels for procurement to replace existing, foreign-built vessels assigned to the RRF.

MARAD will utilize the reflagging process defined by Navigation and Vessel Inspection Circular10-81 (CH-1) as augmented by NVIC 2-95 (CH-3) for enrollment in ACP, as amended, for initial certification. If the vessel is in compliance with the rules of a US recognized class society and the regulations of the IMO as interpreted by its previous flag at the time of reflagging but may not comply with some ACP supplement items, the OMCI may issue an initial COI provided an acceptable schedule is agreed for compliance with the ACP supplement items.

MARAD's intent is to comply with the ACP supplement as soon as possible using the regulatory and classification society gap survey as the guide. The changes will be completed by the next scheduled regulatory drydocking after reflagging. During the reflagging process, the modifications to outfitting and systems, and the timeline for modification before the vessel can transition to a full ACP status, will be recorded and agreed upon by the OCMI in consultation with CG-CVC-4 and MARAD HQ. The agreed schedule and any determinations will be entered into MISLE with copy to MARAD.

C. COI RENEWAL AND ANNUAL INSPECTIONS:

To assure uninterrupted operation when activated, MARAD may request renewal of a COI up to 3 months before expiration for ROS 4/5/10 vessels, and up to one year before expiration for RRF 10/20/30 vessels. In all cases the request for inspection should be submitted to the OCMI a minimum of 30 days prior to the desired inspection date. COI inspection policy for RRF vessels is described below.

- (1) ROS 4/5/10 vessels will maintain current COI
- (2) RRF-10/20/30 vessel COIs will be allowed to expire and renewed at the time of activation

This procedure for Form CG-835V also applies to conditions of class issued by the American Bureau of Shipping or other authorized class society under the ACP program for no sail items.

MARAD will be notified for vessels that are placed on the Coast Guard list for additional inspections due to risk factors.

OCMI's will remove RRF vessels from certificated status if Form CG-835V remain uncorrected beyond the allowed time period. The cognizant OCMI will retain a list of requirements for inclusion in the vessel file. OCMI's may extend the completion dates of requirements at their discretion.

Upon completion of a COI inspection, the attending inspector will provide verbal or written notice of any deficiencies that will be subsequently documented on Form CG-835V. To the maximum extent possible notice will be provided prior to Coast Guard inspectors departing the vessel. Notice should be provided to MARAD's contracted Ship Manager for inclusion in the vessels file. This timely notice will assist the vessel manager with initiating immediate corrective action. Additional copies of the Form CG-835V will be electronically issued to the cognizant MARAD Area Division, as well as the MARAD HQ Division Chief of Maintenance and Repair. Certification information, permanent waivers, notations of alternative compliance or other permanent deviations granted at this time or in the future shall be entered and maintained in the USCG's MISLE database.

D. INSPECTIONS AT ACTIVATION:

Consistent with the general policy of maintaining valid COIs, inspections at activation will be based on the status of the COI. If COI renewal has been requested and is being performed concurrent with the activation, all normally required inspections will be conducted. The provisions of this MOU shall apply to the activation of all vessels listed in Annex IV. At all types of activations, the Master shall also ensure that all crew members are familiar with the vessels Safety Management System (SMS) and in particular any duties they individually have under the SMS.

Other USCG inspections of RRF vessels at activation are described below:

- (1) On **ROS 4/5/10 vessels** with current COIs, the inspection will be limited to clearing Form CG-835V No-sail deficiencies, and the master shall be responsible for conducting a fire and boat drill before the vessel sails.
- (2) On **RRF 10/20/30 vessels** with current COIs, the inspection will include clearing detentions, Form CG-835V, observing a fire and boat drill and inspecting safety and other equipment removed and stowed during laid-up status.

During an activation of a **RRF 10/20/30 vessel without a COI or with an expired COI**, the vessel must satisfy the requirements for a renewal COI RRF vessel, whether in inactive RRF status or in active ROS status, are generally assigned to Phase O when they are operating for a mission or a test activation. For vessels enrolled in ACP during Phase O, survey intervals will be in accordance with ABS Rules

E. FLEET RISK INDEX(FRI):

The Fleet Risk Index process identifies vessels enrolled in ACP (or MSP for commercial vessels) that USCG has determined using risk analysis methodology may experience an increased frequency and number of deficiencies. FRI allows the Coast Guard to focus its limited resources where needed most for flag state oversight inspections. Upon finalization of the FRI list of vessels and their operators, the Office of Commercial Vessel Compliance (CG-CVC-4) will coordinate notification to the MARAD HQ Chief, Division Chief of Ship Maintenance and Repair as soon as practicable for all affected MARAD/DOT-owned or operated public vessels. The purpose of this notification is to increase awareness of the FRI inspections at the program level and thereby increase inspection effectiveness. MARAD HQ will direct field-level Area Divisions to ensure Ship Manager readiness for the marine inspection team and to deconflict DOD or other mission or exercise tasking. The findings of each inspection are to be distributed in the same manner as any Annual or COI inspection, noting that MARAD is a Vessel Owner for Form CG-835V, Box 10.

F. DRYDOCKING:

RRF vessels fall into one of three intervals: a) the normal twice in five-year interval typical of active commercial vessels; b) a five-year interval with drydocking exams scheduled every five years; and c) a ten-year interval with an intermediate exam or exams (see below). Unless otherwise requested by MARAD, the scope of drydocking regardless of interval includes all external and internal hull exams normally conducted in conjunction with the drydocking inspection (i.e., the Internal Structural Examination [ISE], Cargo Tank Internal Examination [CTIE], tail shafts, sea connections, and hull fittings). Those vessels which have a permanent cathodic protection system installed will have the system inspected and serviced regularly. For vessels, which are not fitted with hull blanks (typically ROS 4/5/10 and RRF 10/20/30 vessels), maintenance, dock and sea trial procedures must contain specific actions to assure that marine growth or foreign material is not restricting the flow of water through sea chests or saltwater piping.

MARAD is responsible for tracking accumulated operating time for ROS 4/5/10 and RRF10/20/30 vessels. Note that operating time for ROS 4/5/10 vessels are only periods of time where the vessel is fully crewed and active. When a vessel accumulates three years of operating time during the five or ten-year interval, an appropriate in water exam of the underwater portion of the ships hull will be scheduled immediately by the MARAD Ship Manager/General Agent. Limited extensions of examinations of the underwater portion of the hull may be granted by the OCMI up to 90 days. Further extensions shall be forwarded to the COMDT (CG-CVC-4) for action. Extension requests granted by ABS (for ACP) or the local OCMI which would exceed 90 days will require USCG-CVC approval. MARAD (or its Ship Manager/General Agent) shall submit requests for any further extensions to USCG HQ - COMDT (CG-CVC-4) via the OCMI or for vessels in ACP via the ABS Assistant Chief Surveyor - Government, for approval.

Table 3: Drydock Frequency for the Maritime Administration ROS/RRF Vessels

Vessel Type	Twice in Five	Five	Ten	UWILD
Tank & Pre-positioned	Yes			Yes (1)
ROS 4/5/10 / RRF 10/20/30 with > 3 yrs. of cumulative operating time	Yes			Yes (1)
ROS 4/5/10 with < 3 yrs. of cumulative operating time		Yes		Yes (2)
RRF 10/30 with < 3 yrs. of cumulative operating time		Yes		Yes (2)
RRF 30			Yes (3)	Yes (4)

Notes:

- (1) Intermediate exams may be an Underwater Inspection In-Lieu-Of Drydocking (UWILD), provided the vessel has been previously prepared and found eligible for such an exam. Tankers over 15 years of age are not permitted to use UWILD.
- (2) The intermediate exam or UWILD will be waived for vessels in this interval unless triggered by cumulative operating time, provided the following are found satisfactory by the ABS Surveyor:
 - a) Verify the vessel has no record of groundings, collisions or allisions that would need to be considered for a drydocking.
 - b) Verify cathodic protection system for the hull is operating satisfactorily.
 - c) Verify systems to detect flooding and sound an alarm are installed and operating satisfactorily in the engine room, shaft alley and any other spaces considered appropriate, and there were no alarms of record that would require the vessel to be drydocked.
 - d) If considered necessary, verify by a qualified diver's modified (no TV camera) examination (usually at the time of an activation) that there are no apparent conditions of a concern on the vessel's underwater body or appendages.
- (3) Vessels selected for a ten (10) year drydocking interval must meet both USCG and ABS Rule requirements for UWILD qualification. Prior to the application for a ten (10) year drydocking interval submittal, RRF vessels will be prepared at the preceding Drydocking to the following minimum standards:
 - a) Have a high build, high performance anti-corrosive and anti-fouling underwater paint system and be appropriately marked to facilitate underwater inspection by divers.
 - b) Have a permanent cathodic protection system installed and serviced/renewed as appropriate; and
 - c) Be fitted with arrangements to measure stern tube and rudder bearing clearances.
- (4) MARAD may request and ABS agrees to grant an intermediate underwater examination waiver at the fifth year providing that the vessel has not accumulated more than three (3) years of operating time during the five (5) year interval. An appropriate underwater exam will be scheduled immediately for vessels with more than three (3) years of accumulative operating time during the five (5) or ten (10) year interval.

Vessels approved for a ten-year drydocking interval must be approved in writing by the cognizant OCMI, and appropriate notations in the MISLE database must be entered. Eligibility by vessel type for the ten-year drydocking interval will be in accordance with applicable 46 CFR eligibility criteria (i.e., tank vessels are ineligible). Maximum age restrictions for entry into the extended drydocking intervals may be waived for RRF or other NDRF vessels.

G. VOLUNTARY COMPLIANCE:

It is MARAD's intention to voluntarily comply as much as possible, with the laws, treaties and international conventions along with all other environmental and safety laws from which MARAD is exempt. This should not be construed as a waiver of the public vessel status of NDRF vessels or the granting of rights to any third parties. The extent of compliance will be documented by a USCG recognized classification society (e.g., ABS), with appropriate documentation issued. ROS 4/5/10 and RRF 10/20/30 vessels in Phase M that meet the requirements as set out in Table 3, and the requirements as set out in each Statement of Voluntary Compliance (SOVC) may receive a SOVC certificate.

A SOVC is used for three reasons. First, compliance of said public vessels is voluntary, and the header of the SOVC reflects this. Second, public vessels have sovereign immunity and are not subject to inspection or enforcement actions by foreign regulatory authorities. Third, voluntary enrollment in ACP requires that the vessel comply with the IMO regulations and an SOVC is evidence of meeting this enrollment requirement. A SOVC provides evidence of compliance but does not jeopardize the vessel's sovereign immunity status or expose it to inspection and enforcement actions associated with carriage of an International Certificate.

Issuance of a SOVC requires the same plan review, initial and periodical inspections as an International Certificate. A SOVC is recognized by all international authorities as evidence that the ship complies with the applicable Code or Convention. On MARAD ships, where full compliance with international requirements may not be possible, Statements of Fact (SOF) may be requested to document specific elements of compliance. MARAD (or MARAD's contracted Ship Manager/General Agent) will apply to ABS for, and ABS agrees to conduct plan review and surveys required to issue and maintain a valid SOVC or SOF for:

1. SOLAS Cargo Ship Safety Construction Certificate
2. SOLAS Cargo Ship Safety Equipment Certificate
3. Cargo Ship Safety Radio
4. International Oil Pollution Prevention Certificate (MARPOL 73/78 Annex I)
5. International Sewage Pollution Prevention (MARPOL 73/78 Annex IV)
6. International Air Pollution Prevention Certificate (MARPOL 73/78 Annex VI)
7. International Anti-fouling System Certificate (AFS)
8. International Safety Management (ISM) -Voluntary Safety Management Certificate
9. Other recent International Conventions – in accordance with Annex VII of this MOA.
10. Any other International Conventions which subsequently become effective and MARAD decides to request SOVC.

ROS 4/5/10 and RRF10/20/30 vessels that are in Phase O will comply, to the maximum extent practicable, with all applicable SOVC requirements in the same manner as commercial vessels. ROS 4/5/10 and RRF 10/20/30 vessels in Phase M, that meet the applicable Code or Convention requirements as modified in Annex IVI of this MOU and the requirements as set out in each SOVC will receive a SOVC certificate

Table 4: ABS Checklist Extract for Statement of Voluntary Compliance

ABS SOVC Checklist	Reference	Requirement (In Phase O)	MARAD Action (In Phase M)
Renewal Safety Equipment Survey	SOLAS III/19.3	Last full muster of the crew for boat and fire drill (to be done Monthly or at 25% crew change)?	During annual survey, carry out Boat & Fire Drill with ROS crew OR use sister vessel ROS crew if sister vessel is berthed in the same location. At Activation, Boat and Fire Drill shall be carried out with FOS crew.
	SOLAS III/19.3.3.4	All boats were lowered and maneuvered (once every three months)?	Demonstrate at the annual survey
	SOLAS III/20.6, 20.7	Weekly Inspections of survival craft, rescue boats, and launching appliances, weekly operation of all engines in lifeboats and rescue boats, weekly moving of lifeboats to demonstrate satisfactory operation of launching appliances, and weekly testing of general emergency alarm.	Conduct Monthly
	SOLAS III/20.6 2006, 20.7	Monthly inspections of life saving appliances, including lifeboat equipment	Conduct Quarterly
	SOLAS V/19.2.1.4; V/27	Are charts up to date (and/or is an electronic chart display and information system (ECDIS) available) and are current nautical publications necessary for the intended voyage provided as well as copies of applicable international codes/conventions?	Provide updated charts for local port at Activation
Renewal Minimum Safe Manning & STCW	SOLAS 74/88, regulation V/14 & U.S. Coast Guard COI	Ship's complement complies with the Minimum Safe Manning Document & STCW for hours of work and rest	Comply at activation
Renewal IAPP Annex VI Survey (see Annex III)	MARPOL Annex VI	As applicable based on date of build or engine installation.	Comply at activation

H. PUBLIC NAUTICAL SCHOOL SHIPS:

MARAD owns and maintains multiple Public Nautical School Ships operated as training ships by State Maritime Academies, the U.S. Merchant Marine Academy, and a vessel loaned to a maritime labor training school in MARAD's School Ship program that are in compliance with ABS Rules and USCG regulations. These vessels are classified as public vessels, however MARAD has decided to have these vessels voluntarily comply to the maximum extent practicable with the IMO regulations as described earlier for the RRF. These School Ships should be viewed in the same category as RRF ships in ROS status. Each School Ship maintains a retention crew, and each is berthed at a State Maritime Academy, United States Merchant

Marine Academy (USMMA) or maritime labor training institution campus pier most of the time. Where US regulations exist for public nautical training ships, those regulations are mandatory. Enrollment in ACP is not authorized in US regulations for this category of vessel (46 CFR Subchapter R). However, the USCG has authorized certification of the new construction National Security Multi-mission Vessels (NMSV) using a Design Basis Agreement (DBA). The DBA incorporates many aspects of the IMO regulations, and ABS rules in a manner similar to the ACP program standards as an equivalent to the CFR requirements. The DBA however does not delegate to ABS the inspection of the vessels in lieu of USCG inspection although the USCG OCMI's may cooperate with ABS and take into account the surveys of ABS when determining the scope and detail of USCG inspections. These training ships are on loan to the State Maritime Academies or other maritime training institutions and may be deployed as RRF vessels for national emergencies and other contingencies. During these activations the vessels will retain their normal certificates but the manning for the vessels may change depending on the operations

When no certificated public nautical school ship is available, MARAD may place a certificated NDRF cargo ship at the State Maritime Academy or maritime labor training institution to allow dockside only training of students. No onboard berthing will be permitted. The respective maritime training school or SMA and the local OCMI shall complete an agreement detailing the terms and conditions under which students may be aboard the vessel for training.

I. NATIONAL DEFENSE RESERVE FLEET – EXCLUDING VESSELS OF THE RRF, PUBLIC NAUTICAL SCHOOL SHIPS AND UNIQUE PURPOSE VESSELS:

The NDRF was established under Section 11 of the Merchant Ship Sales Act of 1946 to serve as a reserve of ships for national defense and national emergency purposes. 46 U.S.C. 57100. NDRF vessels, other than School Ships, are located at the James River, Beaumont, and Suisun Bay anchorages and at designated port facility berths. The program primarily consists of dry cargo ships with some tankers and naval auxiliaries. The NDRF Inventory consists of: NDRF Vessels deemed of sufficient value to merit further preservation (Retention Vessels) and vessels that are no longer deemed of sufficient value to merit further preservation (Non-Retention Vessels). Non-retention Vessels will be disposed of by the Federal Government. There are also vessels that are not legally part of the NDRF that are owned/sponsored by other government programs or agencies that are being maintained by MARAD at the NDRF fleet sites on a reimbursable basis (Custody Vessels). Custody Vessels, vessels received for disposal under 40 U.S.C. §548, or repossessed by MARAD will not be subject to this MOU unless specifically added to Annex IV.

Some vessels are in Retention status, which are preserved in a way that keeps them in the same condition as when they entered the fleet. Dehumidification of air-tight internal spaces is an effective means of controlling the corrosion of metal and the growth of mold or mildew. A cathodic protection system uses an impressed current of DC power that is distributed through anodes to the exterior underwater portions of the hull, resulting in an electric field that suppresses corrosion and preserves exposed surfaces of the hull. Cosmetic-appearance work will be deferred, as it is not detrimental to the ability to activate and operate the vessel. These vessels do not maintain a USCG COI during Retention. If activated all lapsed inspections will be carried out prior to issuance of a COI. For the purpose of applying regulations, this will not be considered an initial inspection. The due dates of the vessels last Cargo Ship Safety

Construction Certificate will be used for the last valid COI. MARAD will notify the local USCG Captain of the Port of any NDRF vessels in their zone that due to deterioration or other conditions may pose an immediate threat of pollution or safety to the waterway.

J. UNIQUE PURPOSE SHIPS:

Unique Purpose Ships are those vessels that are taken from one of the three designated NDRF sites and used for specific missions. Government agencies (e.g., Missile Defense Agency) will sponsor the vessel and MARAD via General Agent or Ship Manager, will operate the vessel. These ships will be handled the same as ROS-5 ships. A list of the current Unique Purpose Vessels and their ROS designation is set forth in Annex IV.

K. BAREBOAT CHARTERS

The MARAD retention fleet consists of government owned public vessels. It is possible that MARAD may also bareboat (demise) charter or time charter or voyage charter documented private vessels. MARAD will modify the Annexes hereto to add such chartered vessels and send written notification to USCG of such additions. Only demise chartered vessels are considered as having public vessel status.

Any vessel bareboat chartered by MARAD will be handled the same as ROS-5 ships. The current list of vessels bareboat chartered by MARAD will be provided in Annex IV. MARAD agrees to promptly notify USCG of any bareboat charters and revise Annex IV accordingly. Nothing in this MOA (including the Annexes) is intended to alter the obligations of the responsible parties for other non-bareboat chartered documented privately-owned vessels, under voyage or time charters or other contracts with MARAD, to meet applicable United States law, regulations, ratified treaties and conventions or other agreements established between those parties and the USCG.

VII. VESSEL SECURITY

RRF vessels being subject to 46 CFR Parts 31 and 91 inspection laws are also required to comply with the Maritime Security Transportation Security Act's (MTSA) Title 33, Subchapter H – Maritime Security, Part 104, security regulations affecting vessels. Part 104 primarily revolves around the requirements for developing and sustaining Vessel Security Plans (VSP).

Due to the nature of select NDRF, including RRF vessels and their DOD mission requirements, MARAD or the DOD operational commander may pursue a VSP waiver in accordance with 33 CFR 104.130 at any time. USCG Headquarters Office of Commercial Vessel Compliance (CG-CVC-1) on behalf of the Commandant is the cognizant office responsible for reviewing and approving VSP waivers. VSP waivers will be expedited with a review and determination within 24 hours from receipt. Waivers requests may be e-mailed as scanned attachments to: USCG-FlagStateControl@uscg.mil

For expedience, standardization, and mission assurance when supporting DOD mission activations, compliance with the requirements of 33 CFR Part 104 can be suspended and select

NDRF and RRF vessels will implement and comply with Department of Defense Force Protection (FP) standards and protocols. This measure will not apply to routine activations for exercises, testing, maintenance, repair, or inspection.

VIII. VESSEL REPAIRS, ALTERATIONS, AND PLAN APPROVAL:

If a repair (e.g., item(s) that render the vessel unseaworthy) or alteration is required of a NDRF vessel with COI, MARAD, the master, operator, or person in charge, will notify the nearest USCG sector or marine safety unit where repairs/alterations will be affected prior to any work being conducted. It will be the USCG's determination if it requires official repair, alteration plan review through the USCG's Marine Safety Center or reviewed locally barring qualified personnel. See 46 CFR Sections 91.55-10 and 91.55-15 for more information on plan submittal and procedures.

- (1) Once plan review and work stages have been completed, the USCG sector marine safety unit will have a marine inspector attend the vessel to verify and test accordingly.
- (2) If conditions render the vessel unseaworthy, a Permit to Proceed (CG-948 form) can be requested from the USCG sector or marine safety office so arrangements can be made for repairs in another port. The USCG will evaluate the request and state which conditions (i.e., with or without freight/passengers) that will be required to ensure the safety of the vessel and crew to coordinate movement of the vessel from one port to another port.
- (3) Plan review and approval may be carried out by ABS on behalf of the Coast Guard for vessels enrolled in the ACP program. In addition, NVIC 10-82 and 10-92 allows ABS to conduct limited plan review and approval under a delegation from the Coast Guard as applicable. **It is important to note that equivalency and exemption determinations are never delegated to ABS or any other Recognized Organization and are exclusively approved by the Coast Guard, including approval of Design Basis Agreements for use of equivalent standards.**

IX. MARINE CAUSALTIES

Reporting and investigation shall be in accordance with federal regulations applicable to commercial vessels as described in Title 46 CFR Part 4. CG-2692 forms may be electronically downloaded from Commandant (CG-611's) forms management website at:
<http://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy-CG-5P/Inspections-Compliance-CG-5PC-/Office-of-Investigations-Casualty-Analysis/2692-Reporting-Forms-NVIC-01-15>

- a. Inherently Military Operations or Military Operations. Mariners aboard MARAD vessels under the OPCON of the Department of Defense or following directives associated with national defense or national emergency, may be required to conduct inherently risks on military operations that introduce risks not encountered by commercial shipping operators. Inherently military or military operations are any operation or training not reasonably found during commercial operations. Examples include, but are not limited to underway replenishment (UNREP), vertical replenishment (VERTREP), operationally deceptive practices, military-like operations for governmental objectives, operating under military

orders, such as operating without lights in a convoy, and submarine (or other close quarter) escorts, etc.

- b. Operationally Deceptive Practices: NDRF vessels may be required to utilize operationally deceptive practices to reduce the possibility of detection, tracking, or attack by an adversary, especially in contested maritime environments. These practices may involve turning off some or all of shipboard devices and systems that radiate electromagnetic energy or signals, such as radars, navigation lights, depth finders, sonars, voyage data recorders, Electronic Chart Display and Information Systems (ECDIS), radio signals, satellite transmissions, Automatic Identification System signals (AIS), Global Tracking Distress and Safety Systems (GMDSS), and Long-Range Identification & Tracking signals (LRIT).
- c. Even where marine casualty occurs due to an Inherently Military Operation or Military Operation or the use of Operationally Deceptive Practices, masters should still report marine casualties as defined by 46 C.F.R. Part 4 to appropriate.
- d. Where the vessel is under MSC OPCON, MSC will conduct investigations in accordance with Navy & Marine Corps Mishap and Safety Investigation, Reporting, and Record Keeping Manual (OPNAVINST 5102.1D.). MARAD also will investigate such marine casualties in accordance with MARAD's procedures.
- e. The USCG has authority to investigate matters pertaining to the conduct of any person who holds a USCG issued credential, and is, or was employed aboard a MARAD vessel. As stated within the provisions of 46 CFR Part 5, the USCG has authority to take administrative actions against a USCG-issued credential held by any crewmembers assigned to a MARAD vessels.
- f. The USCG agrees that it will not take action, such as a suspension or revocation, against the credential of a mariner serving or who has served on a MARAD vessel for misconduct or violation of law or other regulation occurring while the vessel is conducting "Inherently Military Operations, Military Operations" or "Operationally Deceptive Practices" if an appropriately authorized officer of the Military Sealift Command or other Department of Defense component certifies to the USCG that the alleged acts are causally related to the vessel's "Inherently Military Operations" or "Operationally Deceptive Practices." Provided the credentialed mariner was acting in accordance with the procedures specified for the operation.

Mariner actions that constitute negligence, misconduct, incompetence, violation of a regulation or the use of drugs or alcohol, unrelated to the vessel's "Inherently Military Operations", Military Operations or "Operationally Deceptive Practices" are intended to remain fully subject to USCG procedures regarding mariner conduct.

- g. Mariner actions that constitute misconduct in the form of Sexual Assault, Sexual Harassment or other Harassment will be subject to misconduct reporting by their companies, in the same manner as they report other U.S.-credentialed mariners crewing their non-NDRF commercial vessels. Where they have reason to believe a contracted operator is not complying with reporting requirements, MARAD should notify the Coast Guard in accordance MSIB 01-23 (or as amended).

X. APPLICATION FOR NATIONAL DEFENSE WAIVER

When compliance with applicable laws, regulations, or overdue classification surveys are not compatible with DOD's operational requirements, a waiver of specific regulations will be requested for an NDRF vessel in the interest of national defense. Any waiver requests for vessels under the OPCON of the Department of the Navy, Commander, Military Sealift Command will be submitted by MSC. Where OPCON is for another component of DOD or another federal entity, then MARAD may submit the waiver request with a letter of endorsement from that entity. Waivers will be submitted, in writing on Form CG-2633, to Commandant via Flag State Control Division (CG-CVC-4). In cases of extreme urgency, when Commandant cannot be contacted the cognizant USCG District Commander, or their designated representative may grant the waiver in accordance with 46 CFR 6.01(d). When such cases involve classification surveys that do not adversely affect the safety of the vessel, crew, environment, or the vessel's fitness to proceed, the Chief, Division of Maintenance & Repair, MARAD, will request appropriate extensions to complete the surveys from the USCG.

During activations of RRF vessels for rapid deployment of U.S. forces during armed conflict or national emergency situations, the Commandant, or cognizant District Commander can designate the OCMI as the person authorized to grant temporary waivers at the request of MARAD, for material deficiencies that do not adversely affect the safety of the vessel or crew (e.g., pollution prevention systems). The waiver procedure contained in 46 CFR 6.01(d) shall be followed for oral waiver applications.

XI. WAIVERS FOR CONTINGENCIES AND NATURAL DISASTERS

NDRF vessels can be employed as part of a federally directed response to disasters not associated with DOD operations. Examples might include such natural events as hurricanes, earthquakes, floods, tsunamis, fires, explosions and/or the destruction of property or critical infrastructure not associated with attack or armed conflict. Every effort should be made by MARAD to encourage federal agencies making the request for NDRF support to utilize NDRF vessels which can accomplish the mission within the limits of the vessels current Coast Guard COI. In instances where it is necessary to depart from the COI limitations (e.g., carriage of additional personnel onboard in excess of berthing or lifesaving equipment) or to defer a required repair or scheduled inspection, a request may be made to the local OCMI with a copy to Commandant, via Flag State Control Division (CG-CVC-4) who will coordinate to determine the best method to support the waiver request based on existing policy, procedures and authorities.

XII. USE OF DOD STANDARDS

DOD has established operational standards for military vessels. Should MARAD determine that the employment of these operational standards would provide a better alignment with the required military sealift operations, MARAD may request from the Commandant (CVC); the acceptance of the DOD standard in lieu of the standard prescribed for commercial vessels. Such items might include, but is not limited to, cyber security risk management practices, cargo securing manuals and procedures, or functionally equivalent outfitting.

XIII. APPEALS

When application for a National Defense Waiver is not being sought, any decision by the OCMI may be appealed to the Commandant in accordance with 46 CFR 2.01-70 and 46 CFR 1.03. Due to the urgent nature of NDRF/RRF operations, all appeals will be acted upon within 24 hours of receipt, when vessels are being activated to support a national defense or emergency contingency. A vessel in ROS and not in an activation mode, will have any appeals reviewed in a timely manner. The process by which an appeal is presented will be as follows:

The Ship Manager/General Agent and MARAD Area Division representative will compile the necessary documentation as soon as possible stating the reasons for the appeal, any mitigation for the condition, and the effect upon national security or emergency response if it is not granted. This will be communicated to the local OCMI or the issuer of the Form CG-835V to seek a reconsideration of the finding or deficiency, including a review of the newly provided information. If an appeal is still necessary following review by the local OCMI, with no change in the finding or deficiency, it will be appealed to the District Commander, and potentially the Commandant, if necessary.

Appeals to the District Commander will be submitted by MARAD's Director, Office of Ship Operations (MAR-610), via the Commandant Office of Commercial Vessel Compliance (CG-CVC-4), and with copy to Assistant Commandant for Prevention Policy (CG-5P),

Appeals to the Commandant will be submitted by the Deputy Associate Administrator for Federal Sealift (MAR-600.1)/Director, Office of Ship Operations (MAR-610), via the Assistant Commandant for Prevention Policy (CG-5P).

XIV. POINTS OF CONTACT

Regular communication and cooperative meetings are encouraged through the responsible agency offices with contact information provided below. Policy, standard operating procedures, and guidance are recommended areas for discussion with the notion that this MOU will undergo periodic review with aim at process and MOU improvements. MARAD ship managers/general agents are reminded of the USCG's website with local USCG sector commander / Officer in Charge, Marine Inspection (OCMI) address, phone, and e-mail information. The Coast Guard Home page is located at: <https://www.uscg.mil>

U.S. DOT, MARITIME ADMINISTRATION (MARAD)

Office of Ship Operations

Chief, Division of Ship Maintenance & Repair (MAR-611)

1200 New Jersey Avenue, SE

Washington, DC 20590

(1) Telephone: (202) 366-1742

(2) Fax: (202) 366-3954

(3) E-mail: mccwatchanalyst@dot.gov with copy to Joseph.McElhinney@dot.gov

U.S. COAST GUARD (USCG)

Office of Commercial Vessel Compliance, Flag State Control Division (CG-CVC-4)

2703 Martin Luther King Jr. Ave SE

Washington, D.C. 20593-7581

(1) Telephone: (202) 372-1222

(2) Fax: (202) 372-8386

(3) E-mail: USCG-FlagStateControl@uscg.mil with copy to John.J.Hannon@uscg.mil

XV. OTHER PROVISIONS

MODIFICATION. This MOU may be modified at any time by mutual agreement of the parties. Either party may propose modifications whenever deemed necessary or desirable. The parties agree to consider such proposed modifications promptly. Subject to the authority of MARAD to unilaterally add, subtract, or modify the status of NDRF vessels in Annex IV with respect to this MOU, the Annexes to this MOU may be updated at any time by mutual agreement of the parties and revised Annexes issued under the joint signature of the USCG POC and MARAD POC listed under Annex IV MOU Official Points of Contact. All revisions to Annexes, including revisions to Annex IV will be numbered, dated, and entered into the MOU Annex Revision History.

The MARAD POC shall ensure prompt distribution of any revised Annexes and the updated MOA Annex Revision History to all MARAD and its Ship Manager/General Agent/Maritime Academy personnel who keep copies of this MOU. The USCG POC shall ensure prompt distribution of any revised Annexes and the updated MOU Annex Revision History to all USCG personnel who keep copies of this MOU.

NO THIRD-PARTY BENEFIT. This Agreement does not confer any rights or benefits upon any third parties.

OTHER AGREEMENTS UNAFFECTED. This MOU is not intended to alter or influence the agreement between USCG and any other federal government agency regarding that agency's vessels. Nothing in this MOU is intended to conflict with applicable statutes, regulations, rules, or policies of MARAD under the DOT, USCG under the Department of Homeland Security and ABS.

ANTI-DEFICIENCY. As required by the Anti-Deficiency Act, 31 U.S.C. §§1341 and 1342, all commitments made by the USMMA or MARAD are subject to the availability of appropriated funds and budget priorities. Nothing in this MOU, in and of itself, obligates MARAD or its Ship Managers/General Agents to expend appropriations or to enter into any contract, assistance agreement, interagency agreement, or incur other financial obligations. Any transaction involving transfers of funds between the Parties will be handled in accordance with applicable laws, regulations, and procedures under separate written agreements.

SEVERABILITY. Each of the Parts or any portion thereof of this MOU shall be deemed severable and should any Part or any portion thereof be held invalid, illegal, or unenforceable,

the remaining Parts and portions thereof shall continue in full force and effect and unaffected to the fullest extent permitted by law and regulation. The headings herein are for the sake of convenience and reference only and shall not affect the interpretation of this Agreement.

USER FEES & INTERNATIONAL TRAVEL REIMBURSEMENT: NDRF and RRF vessels are exempt from user fees for coast guard inspection. Reimbursement of travel expenses for inspections conducted outside of the US and its territories is required.

GOVERNING LAW. This MOU shall be governed by and construed in accordance with Federal law.

XV. EFFECTIVE DATE

THE TERMS OF THIS AGREEMENT WILL BECOME EFFECTIVE WHEN (SIGNED/DATED) BY BOTH MARAD AND USCG PRESIDING OFFICIALS AND SUPERSEDES THE FORMER MEMORANDUM OF UNDERSTANDING, DATED FEBRUARY 22, 2013. termination and disagreements.

This agreement may be extended or renewed in part or whole by mutual written agreement of the parties. Either party upon sufficient written notice to the other party may terminate this MOU, which would revert explicitly back to what is prescribed in U.S. law and regulation for certification and inspection of DOT owned and operated vessels by MARAD.

In the event of a disagreement under this MOU, the staff of the USCG and MARAD shall endeavor to resolve such disagreement. Disagreements that are not resolved by staff shall be referred to the attention of the Assistant Commandant for Prevention Policy (CG-5P) and Associate Administrator for Strategic Sealift. Their decision shall be final and conclusive.

XVI. APPROVED BY

WAYNE R. ARGUIN
Name: Rear Admiral, USCG

DOUGLAS M. HARRINGTON
SES

Agency: U.S. Coast Guard

Maritime Administration

Title: Assistant Commandant for Prevention Policy (CG-5P)

(Acting) Associate Administrator for Strategic Sealift (MAR-600)

Signature / Date

Signature / Date

ANNEX I

GLOSSARY

Alternate Compliance Program: RRF vessels which meet the criteria may enroll in the ACP program, in accordance with the applicable enrollment regulations contained in 46 CFR along with the guidance in NVIC 2-95 (CH-2). ABS is authorized by the USCG to enroll RRF vessels in ACP. Under the ACP, the USCG will accept surveys performed by ABS as equivalent to tests and examinations required for initial and in-service inspections for certification, periodic re-examination, and drydock examinations. The USCG will conduct oversight of ABS under this program. For vessels in the ACP, the USCG shall credit all inspections performed by ABS with the same credit date as ABS.

C-Rating: Alternately referred to as “C-Status” or “Readiness.” Not to be confused with ‘R-Status.’ Developed by the Maritime Administration in coordination with the U.S. Transportation Command, C-Ratings identify and report a vessel’s condition relative to its ability to meet its assigned Readiness Status (R-Status) activation timeframe. (See C1, C2, C3, C4, C5, OP and PP)

C1 {C-Rating}: No Mission Degrading Deficiencies: Describes a ship having no known deficiencies which impact its mission or activation within assigned activation period.

C2 {C-Rating}: Documented and Correctable Mission Degrading Deficiencies: Describes a ship which has mission degrading deficiencies which can be corrected within the assigned activation period.

C3 {C-Rating}: Mission Degrading Deficiencies Exist Which Cannot be Corrected (within the assigned readiness period): Describes a ship which can be activated within its prescribed readiness time frame but has deficiencies which cannot be corrected within the activation time frame and limits the full operational capability of the ship.

C4 {C-Rating}: Major Deficiencies Prevent the Ship Activating or Performing its Primary Mission and cannot be corrected within the assigned readiness period: Describes a ship which cannot be fully mission capable within the activation period, or a ship which has a COI that will expire within 15 days or a COI that has expired. RRF 30-day ships are exempt from C-Status downgrade due to COI expiration.

C5 {C-Rating}: Scheduled Major Repairs in Progress; unable to meet assigned readiness period: Describes a ship undergoing major repairs, upgrades or inspections which prevent it from meeting its assigned readiness time frame.

Commandant²: In general, the use of the term “Commandant” denotes the Commandant of the USCG and includes USCG Headquarters and the various staff elements which are

² For further information and more detailed descriptions, the USCG Marine Safety Organization and definitions of titles and functions are contained in Title 46, Code of Federal Regulations, Subchapter A. Subpart 1.01 of Subchapter A, “Organization and General Flow of Functions,” contains a thorough list of organizational titles and corresponding functions pertinent to USCG inspection of merchant vessels. In addition to titles and organization, Subchapter A provides a useful description of the decision-making flow within the Coast Guard Marine Safety

authorized to act on the basis of the Commandant's authority. For example, CG-CVC administers the inspection program for merchant vessels, including those in the NDRF, pursuant to authority delegated from the Commandant.

Detention (previously no sail):

District Commander: For marine inspection related issues within the boundaries of each geographic district, a staff officer designated as the Chief, Prevention, who acts on the basis of the USCG District Commander's authority. District Commanders are subordinate to the Commandant.

General Agent: A ship operating company that performs as an agent of the government on behalf of the Maritime Administration for the maintenance and operation of NDRF vessels by letter of assignment through a preexisting agreement. The General Agent is empowered to act as Maritime Administration's agent in all matters related to vessel maintenance, inspection, activation and operation. A General Agent is in many ways is analogous to a "Ship Manager." However, unlike a Ship Manager, a contract with a MARAD General Agent creates privity of contract between MARAD and the party contracting with the General Agent because MARAD is the disclosed principal of the General Agent.

Maritime Administration Liaison: Individual on staff at the Maritime Administration Headquarters, delegated by the Chief, Division of Maintenance and Repair in the Office of Ship Operations. Acts as the liaison to both the USCG and ABS on matters pertaining to merchant vessel inspection requirements as they relate to NDRF vessels.

Marine Inspector: Either an officer or civilian federal employee of the USCG, designated by the OCMI to witness all required tests and inspections on board merchant vessels. The Marine Inspector is the primary individual in the field tasked with direct physical observation and initial evaluation of a particular vessel for compliance with vessel safety regulations. The marine inspector is subordinate to the OCMI.

Marine Surveyor: Maritime Administration field staff employee responsible for one or more NDRF ships to oversee vessel maintenance, repairs, and activations. Assigned to a geographic Area Division and subordinate to the MARAD Ship Operations and Maintenance Officer, works closely with Port Engineers and their respective Ship Managers/General Agents to ensure that vessels are kept in their assigned readiness status. May also function as the Contracting Officer's Representative for operating contract administration and oversight of the assigned Ship Manager or General Agent.

Flag State Detention, Code 30, Form CG-835V: A deficiency which, as determined by the OCMI, would seriously endanger the vessel or its crew if the vessel proceeded

Officer in Charge, Marine Inspection (OCMI): The individual designated and delegated to give immediate direction to marine safety functions including the inspection of vessels within their zone. OCMI's are subordinate to the Sector Commander.

OP (C-Rating): Operational: Describes a ship placed in operational status for the purpose of supporting military exercises or operations as required for the national defense.

Program. Various subchapters within Title 46 CFR also define organizational titles (e.g., OCMI).

Phase M - Maintenance: The retention phase wherein an RRF vessel is maintained, tested, and otherwise prepared to meet its assigned readiness status. Vessels in Phase M are either in Reduced Operating Status (ROS), or RRF 10/20/30. RRF 10/20/30 vessels undergo periodic “Phase M Maintenance Cycles,” based on ship specific maintenance procedures. ROS vessels undergo continuous maintenance cycles performed primarily by the embarked ROS crew. The Ship Manager/General Agent is contractually responsible for assigned vessels in this phase.

Phase O - Operation: Vessels, which have been activated for exercises or national defense purposes, are placed in Phase O once tender to the MSC has been accepted. During Phase O, RRF vessels come under the operational control of MSC, but administrative control (ADCON) is retained by the Maritime Administration and the Ship Manager/General Agent. There are times when vessels are activated/operated under Maritime Administration OPCON (i.e., Hurricane Response)

Port Engineer: The “on site” representative of the General Agent or Ship Manager. Responsible for the daily operations required for the various Phases of RRF Management. Works closely with the Marine Surveyor during activations and inspections.

PREPO (Pre-Position): Describes a ship placed in operational status for the purpose of pre-positioning military cargo in a designated theater of operations.

Preventive Maintenance Program (PMP): A program of routine and continuous maintenance of the hull and machinery. The program should be developed in consultation with the manufacturers of the machinery and the various lubricants and coatings used to preserve the hull and machinery.

Readiness: Not to be confused with Readiness Status. See “C-Rating.”

Readiness Status {R-Status}: Readiness status is defined as the timeframe in which the Maritime Administration must activate and tender a vessel to DOD. A vessel’s R-Status is designated by the Department of Defense (DOD). The two categories of R-Status are: a) ROS and b) RRF.

ROS/# {R-Status}: Reduced Operating Status/# Days - Vessels in Reduced Operating Status have a reduced crew of key personnel living on board for maintenance purposes. The 4, 5 or 10 after “ROS” indicate the number of days authorized for vessel activation and tendering to Military Sealift Command’s Operational Control.

RRF/##{R-Status}: Ready Reserve Force/## Days - RRF vessels are in deep lay-up, generally at one of the National Defense Reserve Fleet Sites or a designated port facility berth. A vessel in this status may require towing to a repair facility for activation, crewing, storing and sea trials prior to tendering to Military Sealift Command’s Operational Control. The number following “RRF” indicates the number of days authorized for vessel activation and tendering to Military Sealift Command’s Operational Control.

Rules: The requirements set forth by a classification society to which a vessel is constructed and maintained. For the purposes of the NDRF, the term Rules refers to the Rules of the American Bureau of Shipping.

Ship Manager: A ship management company that is contracted for the maintenance and operation of NDRF vessels and responsible for all matters related to vessel

inspection, activation, and operation. The Ship Manager is an independent contractor for purposes of procurement of supplies and services for maintenance and is contractually responsible for maintaining the vessel(s) in class and certified. A ship manager is not an agent of the Government for purposes of the government procurement contracting.

Ship Operations & Maintenance Officer (SOMO): Is the primary point of contact in the field office organization for MARAD. Located within a geographic Area Division, the SOMO manages the actions of MARAD Marine Surveyors and tasks contracted Ship Managers or General Agents operating NDRF or RRF vessels.

Sof: Statement of Fact

Surveyor, Exclusive: Not to be confused with the term Marine Surveyor. An Exclusive Surveyor is a full-time employee of the American Bureau of Shipping.

U.S. Coast Guard Liaison: The federal civilian employee on staff at USCG Headquarters, who is filling the position of Director of Military Sealift Inspection policy within Office of Commercial Vessel Compliance, Flag State Control Division (CG-CVC-4) Acts as the liaison to and from Maritime Administration as the need arises for the vessel inspection and certification activities addressed by this MOU.

**ANNEX II to the Maritime Administration / USCG Memorandum of Understanding;
COMMAND, CONTROL & COMMUNICATIONS**

I. INTRODUCTION

As in all complex operations involving inter-agency coordination, rapid and effective communications are essential. This section identifies procedures ensuring that communication is maintained between USCG, ABS and the Maritime Administration decision makers to facilitate the inspection of the NDRF.

II. USCG / ABS / MARITIME ADMINISTRATION ORGANIZATION

Figure (1) illustrates an index of decision levels of the ship inspection team and the relationships between USCG, ABS and the Maritime Administration.

III. ORGANIZATIONAL POINTS OF CONTACT

Overview ABS / USCG / Maritime Administration: As Figure (1) illustrates, a one-to-one correlation among the three organizations does not exist at all levels of RRF inspections and activations. At the headquarters level, interagency coordination is expedited by ABS/USCG/Maritime Administration liaison officers located at ABS, USCG and the Maritime Administration Offices and Headquarters. Below the Headquarters level, the organizations diverge in both geographic distribution and assignment of responsibility for completion of ABS and USCG inspections. The Maritime Administration currently has three Area Division offices; the USCG has 9 districts, each with two or more OCMI zones; and ABS has three divisions (not including the ABS Corporate Office). This results in each Maritime Administration Area Division office spanning several OCMI zones and at least two USCG District Commanders, and the three ABS Survey Managers and Director of Government Services. Most OCMI inspection zones lie entirely within the boundaries of a single Maritime Administration Area Division.

Inspection Scheduling and Conduct: OCMI, ABS Attending Surveyors and the Maritime Administration coordinate scheduling of RRF vessel inspections, and work to resolve deficiencies noted during inspections on board the vessel in question. As discussed in the MOU, the Maritime Administration employs Ship Managers and/or General Agents to manage all aspects of RRF vessel maintenance and operations. The Ship Manager/General Agent, through an assigned Port Engineer, is the primary point-of-contact when requesting and conducting RRF vessel inspections and surveys. This delegation of responsibility does not, however, relieve the cognizant Area Division from its oversight responsibilities, or from its ultimate responsibility as vessel owner.

The following procedure shall be followed when scheduling and conducting vessel inspections and surveys:

Prior to the commencement of an inspection or survey, the Ship Manager/General Agent shall contact the cognizant OCMI and/or responsible ABS field office in whose zone an RRF vessel is to undergo inspection or survey. The Ship Manager/General Agent will identify the vessel, their designated Port Engineer and the Maritime Administration Marine Surveyor who will be available to respond to inquiries and resolve inspection issues, when requested by the OCMI, USCG marine inspector, ABS field office, or ABS Surveyor.

Prior to, or as soon as possible after the commencement of any regulatory inspection or classification survey (i.e., COI, Drydock Exam, Cargo Gear, etc.) of an RRF vessel, the attending USCG Marine Inspector(s), and/or ABS Surveyor(s) will meet with the Port Engineer and the Maritime Administration Marine Surveyor. They will agree on a schedule for maintaining contact with each other to discuss inspection and survey issues. USCG, ABS, Ship Manager/General Agent Port Engineer and the Maritime Administration will be readily accessible to each other throughout the course of the inspection or survey, and they will designate an alternative point of contact in the event of an individual's absence.

Coordination: When inspections or surveys involve multiple OCMI's, District Commanders, ABS Offices or the Maritime Administration Ship Manager/General Agent(s) and Area Division offices, these individuals are encouraged to make direct contact with each other when coordination is required to resolve inspection issues involving an RRF vessel. This should occur as early as possible.

For issues requiring headquarters level policy interpretation, or requiring a national defense waiver, either agency, at any level, may contact the ABS/USCG/Maritime Administration liaison officers. The liaison officers will assist by contacting the appropriate headquarters staff at each agency and coordinate a response to the issue/inquiry. Each agency will then be responsible for rapidly transmitting its decision to the subordinate offices and commands involved.

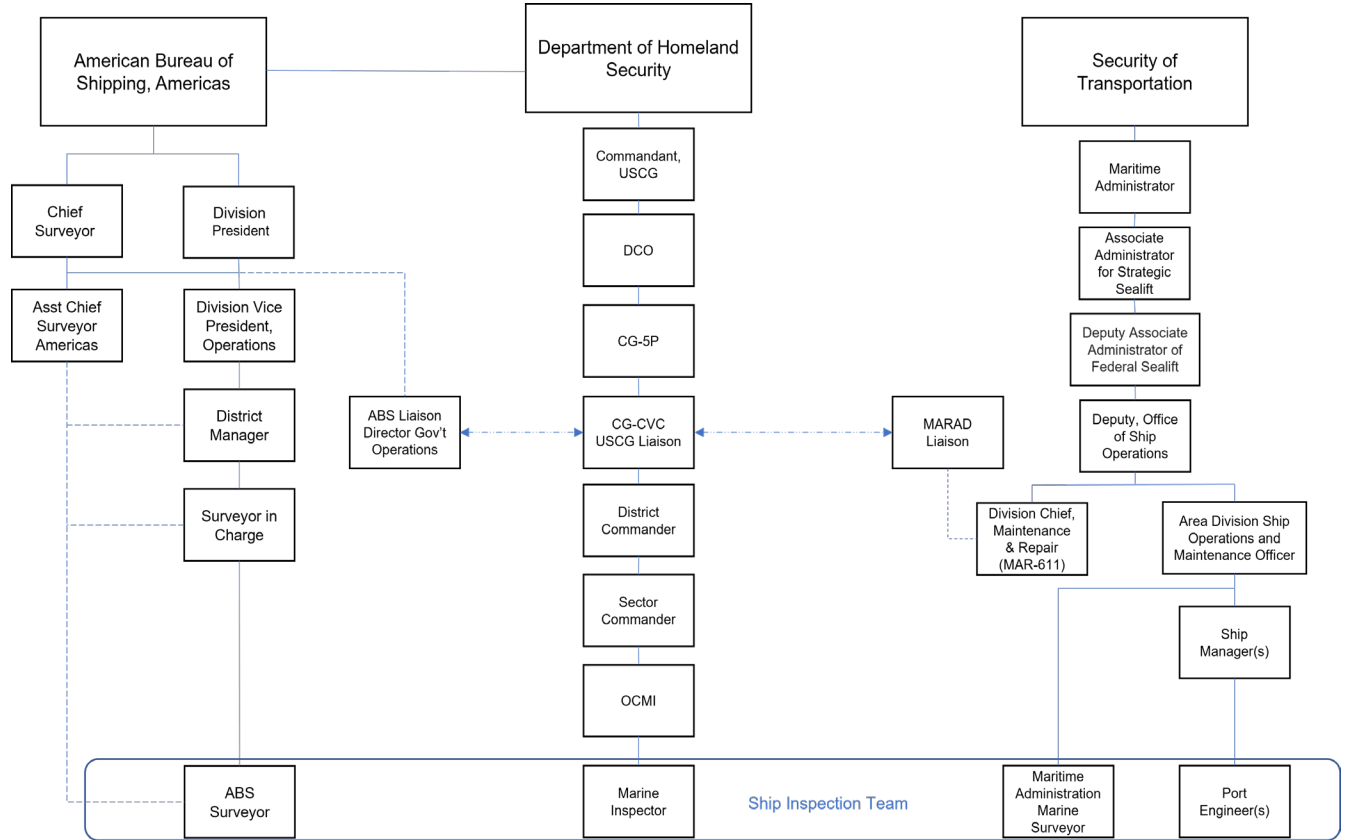
Fleet Risk Index (FRI)

Annually the Coast Guard evaluates the risk of each US Flag Vessel enrolled in the Alternate Compliance Program using a variety of factors. If a vessel's risk is above an established threshold based on those factors, then it will be assigned to the FRI. The presence of a vessel on the FRI does not indicate that the vessel is substandard or that it is not in compliance with the applicable regulations. The FRI is only a management tool for the USCG to assign additional resources to examine the vessel at more frequent intervals based on risk. Upon finalization of the vessels and operators on the FRI, the Commandant Office of Commercial Vessel Compliance (CG-CVC-4) will coordinate notification to the MARAD HQ Chief, Division Chief of Ship Maintenance and Repair as soon as practicable, for all affected MARAD/DOT-owned vessels.

Form CG-835V

All issued CG-835V deficiencies to a MARAD NDRF or RRF vessel shall copy the MARAD field-level Area Division, in accordance with Form CG-835V Box 10.

**Figure 1: Organization Points of Contact
USCG/ABS/MARAD Organization**



ANNEX III

Exemptions, Equivalences and Alternative Procedures

A. DOUBLE-HULL EXEMPTION:

NDRF vessels, including RRF tank vessels, are exempt under 46 USC § 3703a(b)(5) from complying with the double-hull requirements prescribed by the Oil Pollution Act of 1990 (OPA 90). Further NDRF vessels are exempt under 33 CFR §§ 155.100(b)(1), 157.08(n)(6), and 157.10d from the USCG regulations implementing OPA 90 and Regulations 19 and 20 of MARPOL Annex I, through the Act to Prevent Pollution from Ships, requiring double-hull construction.

B. INTERNATIONAL CONVENTION EXEMPTIONS:

Because of their public vessel status and national defense operations, NDRF vessels are exempt from certain international convention regulations such as the Safety of Life at Sea (SOLAS) and Prevention of Pollution from Ships (MARPOL). These vessels when engaged only in non-commercial service do not require international convention certificates and instead receive a USCG COI. The International Maritime Organization (IMO) and its associated conventions recommend voluntary compliance with international treaties and regulations. MARAD will comply with the requirements of the international regulations to the maximum extent practicable. NDRF vessels identified in Annex IV vessels will comply with applicable requirements of the international conventions that have been adopted into U.S. laws and regulations. Where such regulations are legally applicable to similarly situated commercial merchant vessels. This process of voluntary compliance is identified in the paragraph on Voluntary Compliance in Section VI.H for clarification on how RRF vessels will voluntarily comply. Additionally, RRF vessels are maintained in classification with the American Bureau of Shipping (ABS) and will comply with regulatory requirements typical of commercial vessels. Other NDRF vessels (except the PNSS) itemized in Annex IV will continue to be classed and maintained with ABS, and generally conform to regulatory requirements typical of U.S. cargo, tank vessel and special mission vessels.

C. INTERNATIONAL SAFETY MANAGEMENT CODE EXEMPTION:

In addition to being exempted from the IMO ISM Code the NDRF/RRF are specifically exempted from compliance with the US regulations in Title 33 CFR Part 96 as noted in 96.210(b)(5). Voluntary compliance is encouraged. The procedure formerly in NVIC 5-99 has been superseded by an ABS procedure agreed to by the USCG. In lieu of an intermediate SMC audit there will be annual SMC audits carried out on vessels in ROS with a renewal audit at 5-year intervals. For School Ships the annual ISM audit will coincide with the commencement of the annual training cruise whenever possible.

D. EXEMPTIONS FOR MARPOL ANNEX VI

Some RRF vessels are unable to fully comply with MARPOL Annex VI, regulations 13 (Nitrogen Oxides), 14 (Sulphur Oxides and Particulate Matters), 22 (Ship Energy Efficiency Management Plan (SEEMP), and 22A (Collection and Reporting of Ship Fuel Oil Consumption Data) for certain vessels. As such, those vessels that do not fully comply with the specified regulations are no longer eligible to receive International Air Pollution Prevention (IAPP) or International Energy Efficiency (IEE) Statements of Voluntary Compliance (SOVC). Such affected vessels will no longer be expected to maintain a SEEMP or report fuel oil consumption data.

MARPOL is not directly applicable as a mandatory instrument pursuant to Article 3 of the Convention. In accordance with this MOU and related Alternate Compliance Program (ACP) policy, MARAD voluntarily agrees to comply with the relevant provisions of international convention to the extent practicable. ABS may issue as appropriate for those RRF vessels that partially comply with other relevant provisions of MARPOL VI (e.g., Ozone Depleting Substances, Shipboard Incineration, Reception Facilities, etc.) ABS is authorized to issue Statements of Fact (SOF) to that effect.

Vessels not in compliance with MARPOL Annex VI may be issued a Statement of Fact attesting to the level of compliance of the vessel in accordance with USCG letter 16711/Serial No. 132 dated 29 May 2019.

This SOF in lieu of a SOVC does not affect ACP eligibility.

E. Exemption from Ballast Water Treatment Systems

The Secretary of Homeland Security, as delegated to Commandant US Coast Guard, designates RRF vessels to be Vessels of the Armed Forces under statute 33 USC 1322(a)(14) except vessels employed in commercial trade operations or as public nautical school ships/training ships when engaged in those activities. MARAD has made the decision to place the RRF in the Uniform National Discharge System (UNDS), in accordance with the accepted designation under this statute. RRF vessels without currently installed BWTS will not be required to install systems. RRF vessels that have installed operating BWTS should continue to maintain and operate those systems.

Annex IV

List of MARAD Vessels

(RRF, School Ships, Unique Purpose Bareboat Charters)

MARAD maintains a current list of all vessels in the NDRF, including the RRF, on its website at <https://www.maritime.DOT.gov/national-defense-reserve-fleet/inventory-archive>. The list is updated at the end of each month.

School Ships are included in this MOU but are not listed as RRF vessels. They are listed under Retention – Passenger Ship