



16713/5
February 24, 2025

Dana Merkel
Blank Rome
1825 Eye Street, NW
Washington, D.C. 20006

Dear Ms. Merkel:

This is in response to your letter of January 27, 2025 requesting confirmation that the construction of three *Aloha L*-class containerships currently under construction at Philly Shipyard, Inc. (PSI) for Matson Navigation Company, Inc. with certain foreign-built components and certain foreign-source steel hull components, will not adversely affect the coastwise eligibility of the subject vessels under 46 C.F.R. § 67.97.

In your letter, you provided a hull component analysis estimating the structural steel weight for each vessel at approximately 13,536.8 metric tons ("Mtons"); an additional 1.85 percent variance weight allowance; and 43.1 Mtons in foreign-built steel components of the hull, for a combined steel weight estimated at 13,579.9 Mtons. You estimated the total foreign component steel weight as 142.5 Mtons, or 1.1 percent of the total 13,579.9 Mtons. Your letter also includes analysis regarding the utilization of bulb flats in stock shapes and sizes sourced from Turkey, and requested confirmation that the bulb flats would not be included in the component calculations. Your letter includes supporting documentation such as build blueprints, drawings, and weight calculations.

Pursuant to our review of your submission and consistent with National Vessel Documentation Center ("NVDC") past practice, we requested a review and analysis of your January 27, 2025 determination request by the Coast Guard's Naval Architecture Division ("NAD").

Upon review, NAD commented that the Upper Deck appears to be the freeboard deck, and the weather-exposed doors, vents, and hatches on that deck, as well as the first deck above it and the Focs'l Deck, are subject to load line requirements. Therefore, these are considered part of the flotation envelope of the hull. Next, NAD noted that the "sunken/recessed bitts," estimated at 6.4 Mtons, are comprised of 4 sets of port/starboard mooring bitts set into recessed "pockets" in the hull, just above the full load and ballast load waterlines. NAD determined that, like recessed lash-down points for container lashing, mooring bitts are outfitting components, and are therefore excluded from the foreign weight calculation. Finally, NAD concurred with your letter's assertion that foreign-source steel stock in original (unworked) condition is not included in as foreign weight.

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After excluding the recessed bits (6.4 Mtons), NAD determined the discounted steel weight for the three containership vessels to be 13,573.5 Mtons. With the total allowable 1.5 percent “major component” weight limit of 203.6 Mtons, the total weight of the foreign-source components (excluding the bits) is 136.1 Mtons, within the allowable “major component” limit. NAD advised that, with respect to future foreign rebuilds, if any, the total cumulative 7.5 percent weight limit is 1,018.0 Mtons, and the maximum 1.5 percent weight limit for any “major component” is 203.6 Mtons.

In light of the foregoing, and based upon the information provided, I confirm that the proposed modifications will not adversely affect the U.S. build status of, and eligibility to operate in the coastwise trades of the United States upon completion, the three new *Aloha L*-class containerships.

Sincerely,



Christina G. Washburn
Director