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CG-MMC Policy Letter  
No. 04-24  
October 8, 2024

From: M. Medina  
COMDT (CG-MMC)

To: National Maritime Center

Subj: TEMPORARY CHANGES IN SERVICE REQUIREMENTS FOR STCW DECK RATING  
ENDORSEMENTS

Ref: (a) National Defense Authorization Act for Fiscal Year 2024 (Public Law 118-31)  
(b) Title 46 Code of Federal Regulations (CFR) 12.603  
(c) Title 46 Code of Federal Regulations (CFR) 12.605  
(d) Navigation and Vessel Inspection Circular 14-14 (NVIC 14-14)

1. PURPOSE. This policy letter addresses the impact the temporary reduction in sea service requirements enacted in reference (a) has on qualification for STCW deck rating endorsements. It provides guidance on how mariners can work towards an endorsement as Able Seafarer-Deck (AS-D) and describes several options depending upon the amount of sea service the mariner has. It also provides guidance on the evaluation of sea service for applicants obtaining Ratings Forming Part of a Navigational Watch (RFPNW) while working towards an endorsement as AS-D.
2. ACTION. The Coast Guard revises the requirements of references (b)-(d) with this policy when evaluating applications for a merchant mariner credential (MMC) with an STCW endorsement as AS-D or RFPNW.
3. DIRECTIVES AFFECTED. Implementation of the Guidelines on Qualification for STCW Endorsements as Able Seafarer-Deck (NVIC 14-14) is temporarily revised.
4. BACKGROUND.
  - a. Section 3534(j) of reference (a) temporarily reduces the sea service requirements for national able seaman (AB) rating endorsements. The Coast Guard published CG-MMC Policy Letter 02-24, *Temporary Reduction in Service Requirements for Certain Deck Ratings*, reducing service requirements for AB. This policy letter will make a temporary reduction and is effective until December 22, 2026, consistent with Policy Letter 02-24.
  - b. The change in sea service requirements for national AB endorsements impacts the qualification process for STCW deck rating endorsements because the regulations and reference (c) assume a

longer period of service in order to qualify for the various national endorsements as AB. This policy letter allows for service toward RFPNW and AS-D to accrue concurrently.

5. **DISCUSSION.** The Coast Guard will review MMC applications for STCW deck ratings for AS-D and RFPNW who have existing service towards ratings. Because holders of national endorsements may have qualified under reduced temporary statutory provisions, the Coast Guard will consider the total service toward STCW deck ratings when evaluating applications. Until December 22, 2026, the service gained towards RFPNW and AS-D will be evaluated and concurrently counted towards those STCW endorsements. The evaluation will be completed as follows:
  - a. For those seeking RFPNW with at least 2 months of service and less than 6 months of service:
    1. Complete approved training for RFPNW, 12.605(a)(2)(ii).
    2. Complete assessments for RFPNW.
    3. May obtain endorsements as RFPNW
  - b. For those seeking RFPNW with at least 6 months of service but less than 12 months of service in accordance with 46 CFR 12.605(a)(2)(i):
    1. Complete assessments for RFPNW.
    2. Complete approved course for either PSC or PSC-Limited.
    3. May obtain endorsements as RFPNW, and PSC or PSC-Limited.
  - c. For those seeking AS-D with at least 12 months service but less than 18 months of service:
    1. Complete assessments for RFPNW and AS-D.
    2. Meet the qualifications for PSC or PSC-Limited.
    3. Complete approved training per 46 CFR 12.603(a)(3)(ii).
    4. May obtain endorsement as AS-D, RFPNW, and PSC or PSC-Limited.
  - d. For those seeking AS-D with 18 months or more of service:
    1. Complete assessments for RFPNW and AS-D.
    2. Meet the qualifications for PSC or PSC-Limited
    3. May obtain endorsements as AS-D, RFPNW, and PSC or PSC-Limited.
  - e. Applications in current inventory. The concurrent credit towards RFPNW and AS-D must be applied to all applications that have not reached final agency action. The NMC will apply these new criteria without requiring a new or amended application. A new application will be required if the MMC has already been issued or if the application has reached final agency action.
  - f. Crediting service for approved training. Service credit for the approved training in paragraphs 5.a-d above will be credited in accordance with the Coast Guard-issued approval per 46 CFR Part 10, subpart D.
  - g. National endorsements. An applicant for these STCW endorsements must hold the appropriate national endorsements. Applicants for RFPNW must hold either Ordinary Seaman or Able Seaman. Applicants for AS-D must hold Able Seaman.

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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