



Subchapter M TPO/Class Quarterly Meeting – 17 December 2020 Meeting Minutes



- I. Opening: The meeting was called to order at 12:01 P.M. CST by CDR Andrew Bender, TVNCOE.
- II. Present: TVNCOE, CVC-1, CVC-4 and representatives from ABS, EDT, ITOW, Sabine, and TVIB.
- III. Agenda Topics and Discussion (Past Business):

- a. MSIB 09-20: Virtual/remote vs extensions:

Coast Guard (CG) shared that boots-on-deck remain the preferred method for compliance verification, but otherwise highly encourage virtual/remote verification over deferring statutory activities. Extension requests are trending down; the TVNCOE has authorized only two (2) external management audit extensions in the last three months.

- IV. New Business: Agenda Topics and Discussion (New business)

- a. Policy Updates:

1. [CVC-WI-013\(5\)](#): Towing Vessel Inspections under TSMS Option; No questions.
2. [CVC-WI-018\(1\)](#): Laid up Inspected / Examined Vessels; Discussion below in f.4.
3. [CVC-WI-027\(1\)](#): Vessel Cyber Risk Management; No questions.
4. Ongoing Work on Doublers and Drydock/ISE Guidance.

a. TPO stated that some towing companies are holding off on drydocks in anticipation of updated CG guidance, and whether the forthcoming guidance will be a drastic change from the current guidance. CG answered that industry should follow current guidance to complete drydocks and hull repair (e.g. [NVIC 7-68](#)).

b. TPO asked if there is a notification requirement for the External Survey Program specific to credit drydocks. CG answered that under the External Survey Program, there is no requirement for notification to the OCMI for credit drydocking. For COI renewal, the company should provide objective evidence to the OCMI demonstrating that the drydock survey was completed.

c. TPO asked for the purpose of a drydock/ISE, and whether it is an evaluation of conditions as they exist at a defined point, or an evaluation that the vessel appears to be suitable for route/service for foreseeable future. CG answered that 46 CFR 137.325(a) and MSM Vol II, B.3.B discuss conduct of drydock exams and indicate that they are completed to assess a vessel's "safety for

continued operation”. [NVIC 7-68](#) further clarifies by stating that the surveyor must assess concerns considering the period of time until next inspection.

d. TPO stated that five years is quite a long time between drydocks and requested the CG’s view regarding continuous monitoring of these vessels. CG answered that continuous monitoring is important and highly encouraged.

5. [Sub M FAQs](#): all sections updated (latest changes Oct 2020); No questions.

b. Fleet Status (no additional discussion).

1. 240 TSMSs/DOCs issued (+8 over six months).
2. 3384 vessels covered by TSMSs/DOCs (+33 over six months).
3. 2,556 total COIs: +688 COIs over six months (67/33 TSMS Option). Single vessel companies at 33.1% (+16.5% over six months), while multi-vessel companies at 50.5% (+14.5% over six months).
4. 313 in COI processing queue.

c. Progress of mid-period management audits.

Completed (78), in window (30), remaining (111). No additional discussion.

d. TPO provided auditor and surveyor trainings.

CG noted that field units have expressed interest in sending marine inspectors to observe TPO led training. This is a great opportunity for inspectors to see how surveyors/auditors are trained, get some face time, etc. If space is available, please send training information directly to the OCMI or to the TVNCOE to notify the appropriate District/OCMI.

e. [TVNCOE Online Training](#)

CG noted that since July the TVNCOE has trained nearly 300 students via CG Marine Inspector Course convenings and field/industry trainings. The TVNCOE posted 10 modules to their website and offers live virtual Q&A sessions for all students. Please click the link above for more information.

f. General TPO feedback/concerns/Poll Everywhere.

1. TPO noted that they have a few cases where OCMI have taken in excess of six months to issue COIs to vessels that have not been requested to correct deficiencies, etc. and whether this meets CG expectations for COI issuance timelines. CG requested/awaiting details regarding the same.
2. TPO noted that during an AWO call it was announced that a number of CG oversight billets would be added to field units, and requested an explanation of how the CG plans to facilitate the same to ensure CG wide consistency. TPO noted that the TVNCOE has been a centralized point for all things towing vessels and TPO oversight since inception of the Subchapter M rule, and they have concerns regarding decentralization of the Subchapter M oversight component. CG answered that these billets (19) will be responsible not only for Subchapter M TPOs, but for all CG oversight programs, and that the CG will ensure consideration for the aforementioned concerns as the positions are developed.

3. TPO noted that they had a discussion with a field unit regarding how a vessel subject to Subchapter M enters the CG UWILD program. The unit referred to 46 CFR 137.335 and [NVIC 1-89](#), and the TPO wanted to ensure no additional guidance was available. CG confirmed the field unit was correct.
 4. CG noted that there were no questions regarding [CVC-WI-018\(1\)](#): Laid up Inspected / Examined Vessels, but asked if TPOs had clients concerned about the WI. TPO requested clarity between laid up and inactive vessels and concern of returning to service following either status. CG explained that to be in laid up status, the company must request the same by the CG, and, if certificated, would surrender the COI and not be counted towards the fleet total for COI phase-in requirements. That said, returning the laid up vessel to service may result in the once “existing” vessel being required to meet new vessel requirements. CG noted that inactive status is not required to be reported to the CG, the vessel maintains the COI (or if not certificated remains subject to Subchapter M), and counts toward the fleet totals for COI phase-in requirements. See the WI (link above) for additional details.
 5. TPO noted that they had documented an area of concern during an external vessel survey that they considered a serious deficiency; however, the CG OCMI representative had knowledge of and dismissed the same. The TPO asked how they should approach said concern. CG responded to reengage the CG representative and move up the unit chain; and, if unsuccessful, to engage the TVNCOE to facilitate further discussion between the parties.
 6. TPO noted that if on numerous occasions they attempt to engage a subunit (e.g. MSU) without response, would it then be appropriate to engage the parent unit (Sector). CG responded to please move up the chain accordingly if a subunit isn't responsive to communications.
- V. Adjournment: This meeting was adjourned at 12:54 P.M. by CDR Andrew Bender
Minutes approved by: *A. R. Bender*