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# DELTA TOWING L.L.C.



February 11, 2005

Executive Secretary, Marine Safety & Security Council,  
United States Coast Guard Headquarters  
2100 Second Street SW.  
Washington, DC 20593-0001

USCG-2006-26202-3

Re: Petition for Rulemaking

Subj: 46 CFR Section 10.465 Requirements for License as Mate of Towing

Dear Sir or Madam:

This is a Petition for Rulemaking. We recommend a change in the aforementioned subject allowing a holder of a *Master license of an inspected vessel of not more than 200 tons* to operate as *Mate of Towing* endorsed with routes of service as described in this section.

A change is necessary so that we may use licensed deck officers operating non-towing vessels in our fleet on our towing vessels. This change would also assist the towing industry in acquiring more qualified licensed personnel.

The rule, as it is written now requires 36 months of service on a towing vessel, 12 months of which is at an entry-level position on the deck. This makes it impractical for an experienced Master of an inspected vessel to become a Master of a towing vessel.

Our suggestion is that a *Master of an inspected vessel of not more than 200 tons*, with 3 years as *Master* and has either satisfactorily passed the *Apprentice Mate Exam* given at the REC or has a *Certificate from an Approved Apprentice Mate Course*, be allowed to work as *Mate of Towing* on appropriate routes for 18 months and have a completed TOAR described in 46CFR section 10.304 before qualifying as *Master of Towing*. This would meet the requirements of Table 10.464-1. This should not be viewed as a "short cut" but rather an alternative that allows a master of an inspected vessel less than 200 tons, to become an officer of a towing vessel in a practical and timely manner.

We appreciate your time, and your consideration and review of this matter. Please don't hesitate to call or write me if I can be of assistance.

Thank you,

Eric Verdin  
CSO, and Training  
Delta Towing, LLC

229 Development Street • Houma, Louisiana 70363-3898  
Office: (985) 851-0566 • Toll: (800) 749-7574 • Fax: (985) 876-4810

U.S. Department of  
Homeland Security

United States  
Coast Guard

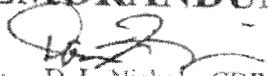


Commandant  
United States Coast Guard

2100 Second Street, S.W.  
Washington, DC 20593-0001  
Staff Symbol: G-LRA  
Phone: (202) 267-1534  
Fax: (202) 267-6234  
Email:

16704

## MEMORANDUM

From:   
D. L. Nichols, CDR  
Executive Secretary, Marine Safety and  
Security Council

Reply to: G-LRA  
Attn of: (202)267-1534

To: COMDT (G-MSO-1)

Subj: PETITION FOR RULEMAKING: REQUIREMENTS FOR LICENSE AS MATE OF  
TOWING

Ref: (a) HQINST M16703.1, Regulatory Development and Review

1. In accordance with reference (a), enclosed for your action is a petition for rulemaking from Mr. Eric Verdin of Delta Towing, LLC. The petitioner requests that the Coast Guard open a rulemaking docket to change 46 CFR 10.465 to allow a holder of a Master license of an inspected vessel of not more than 200 tons to operate as Mate of Towing.
2. You should respond directly to the petitioner. If you decide to initiate a rulemaking project and this rulemaking is likely to be significant under reference (a), then you must draft and receive approval of your regulatory work plan from the Marine Safety and Security Council before responding to the petitioner with your decision to initiate. Please see your regulatory coordinator in G-MSR for guidance.
3. Please choose one of the following options:
  - (a) If you determine that no rulemaking is required, respond to the petitioner with a brief explanation, and keep the petition and response in a public file open for inspection, pursuant to 33 CFR 1.05-20(c).
  - (b) If you want to seek public input on whether to initiate a rulemaking based on the petition, request that G-LRA assign a project counsel, and prepare a suitable notice. Consistent with 33 CFR 1.05-20, the petition, response, and other related documents will be placed in the public docket; or
  - (c) If you decide to initiate a rulemaking based on the petition, request that G-LRA assign a project counsel. If the anticipated rulemaking is likely to be significant under reference (a), then you must draft and receive approval of your regulatory workplan from the Marine Safety and Security Council before responding to the petitioner. Proceed according to applicable regulations and directives, including 33 CFR 1.05.
4. Regardless of which option you select, please inform the petitioner in your response that their petition has been assigned to Docket Number USCG-2005-20460. Also inform the petitioner that their petition, along with any other related documents, may be viewed on line at [www.dms.dot.gov](http://www.dms.dot.gov).
5. Please make a determination and respond to the petitioner within 30 days from receipt of this memo. Please copy G-LRA on all correspondence with the petitioner.

#

Enclosure: Petition dated 11 Feb 2005

Copy: COMDT (G-LRA)  
COMDT (G-M) Regulatory Coordinator

U.S. Department of  
Homeland Security

United States  
Coast Guard



Command  
United States Coast Guard

2100 Second Street, S.W.  
Washington, DC 20593-0001  
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16704

**MAR 04 2005**

Delta Towing, L.L.C.  
Attn: Eric Verdin  
229 Development St  
Houma, LA 70363-3898

Dear Sir:

We are in receipt of your petition for rulemaking, to allow a holder of a license as master of inspected vessels of not more than 200 tons to operate as mate of towing vessels. Your petition has been assigned docket number USCG-2005-20460 and placed within the Department of Transportation's Document Management System. It along with any other related documents may be viewed on line at [dms.dot.gov](http://dms.dot.gov).

At present there has been no determination whether to initiate a rulemaking project. We will be asking the Towing Safety Advisory Committee (TSAC) to provide their advice on your petition as well as any additional recommendations they may have on the issue. A task statement has been drafted and will be presented at the next TSAC meeting, scheduled for March 15 - 16, 2005 at the United States Coast Guard Headquarters Building in Washington, DC. The TSAC meeting is open to the public.

This letter will be added to the docket as well as any documentation from the TSAC meeting. If you have any questions, please contact Mr. Luke Harden of my staff at (202) 267-1838.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Scott".

DAVID L. SCOTT  
Captain, U.S. Coast Guard  
Chief, Office of Operating and  
Environmental Standards  
By direction of the Commandant

Copy: Commandant (G-LRA)