

U.S. Department of
Homeland Security

United States
Coast Guard



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16672
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Ms. Lynn Muench
The American Waterways Operators
1113 Mississippi Avenue, Suite 108
St. Louis, MO 63109

Dear Ms. Muench:

Thank you for your letter outlining your concerns regarding day shape and navigation light requirements for tow boats operating exclusively on the inland Western Rivers. I appreciate the background and history provided on this issue. I concur with your assessment regarding the limited value many of these lights and shapes provide towing vessels. This is particularly valid along the confined and narrow internal waters of the Eighth District including the Western Rivers and Gulf Intracoastal Waterway.

In accordance with 33 Code of Federal Regulations (CFR) Part 84, inland inspected towing vessels are required to be equipped with navigation lights, shapes, and sound signals. Depending on the navigation equipment carried, the carriage of day shapes and outfitting of navigation lights when aground, not under command, or at anchor may be impractical.

Historically, Certificates of Alternative Compliance (COACs) have been used to certify that full compliance with the Inland Navigation Rules Act of 1980 would interfere with a vessel's special functions or would not significantly enhance safety. I am prepared to issue COACs to inland towing vessel companies across the Eighth Coast Guard District for: Vessels Aground as noted in Inland Rule 30(f); Vessels Not Under Command as noted in Inland Rule 27(a); and/or Vessels at Anchor as noted in Inland Rule 30(a)-(c) if the vessel is not equipped with an anchor and associated ground tackle.

In accordance with 33 CFR 89.5, inland towing companies applying for a COAC should submit a written request to the Eighth Coast Guard District Chief of Prevention. COACs should only be submitted by those companies operating inland towing vessels exclusively on Internal Waters as defined in 33 CFR 2.24 within the Eighth Coast Guard District as defined by 33 CFR 3.40-1(b). The request should include the information required in 33 CFR 89.5(a)(1)-(6), and a listing of ALL vessels operated by the company to be covered by the COAC.

I remain committed to providing a common sense approach to Subchapter M compliance. Please contact Jill Bessetti, the Eighth District Towing Vessel Specialist, at (504) 671-2264 with any further questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. R. Callahan".

D. R. CALLAHAN
Rear Admiral, U.S. Coast Guard
Commander, Eighth Coast Guard District