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Homeland Security

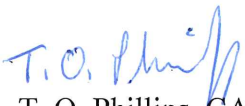
United States  
Coast Guard



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16711  
D8(dp) Policy Letter 02-2022  
June 6, 2022

  
From: T. O. Phillips, CAPT  
CGD EIGHT (dp)

To: Distribution

Subj: GUIDANCE FOR TOWING VESSEL SIDELIGHT PLACEMENT

Ref: (a) International Regulations for Prevention of Collisions at Sea, 1972 (72 COLREGS), Annex I, Paragraph 3(b)  
(b) Title 33 Code of Federal Regulations (CFR) 84.03(b)  
(c) Commandant Instruction (COMDTINST) 16000.70, Marine Safety: Inspection of Engineering Systems, Equipment, and Materials

1. PURPOSE. This policy provides additional guidance regarding the placement of side lights on towing vessels being constructed or operating within the Eighth District.
2. BACKGROUND. The International and Inland Navigation Rules, references (a) and (b), state that for power-driven vessels of 20 meters or more in length, side lights "shall be placed at or near the side of the vessel." The Coast Guard Marine Safety Manual, reference (c), interprets "at or near the side of the vessel" to mean not more than 10 percent of the breadth of the vessel inboard from the side, up to a maximum of 2 meters.

Due to the nature of their work and standard design practice, a majority of towing vessels are designed with superstructures that get narrower toward the top. This design protects the towing vessel superstructure from damage due to contact with equipment, objects, or other vessels. Towing vessel sidelights are typically placed along the outboard edge of the pilot house, which provides the necessary height of eye for the lights. However, the distance from the sidelights to the edge of the vessel is usually more than 10% of the breadth, which does not meet the Coast Guard's interpretation of "at or near the side of the vessel." There are currently more than 3,400 towing vessels operating in the Eighth District area of responsibility, and many of these vessels do not meet the sidelight interpretation.

When a vessel is unable to fully comply with the International or Inland Navigational Rules due to the special function of the vessel, the owner, builder, operator, or agent may apply for a Certificate of Alternative Compliance (COAC). These requests are sent to the Coast Guard District where the vessel is being built or operated. If the District office determines that the alternative compliance is justified, they will issue a COAC. Between 2019 and 2021, the Eighth District issued 25 towing vessel COACs due the position of the sidelights, but many of the towing vessels that do not meet the sidelight interpretation have never applied for, or received, a COAC.

3. ACTION.

- a. If a towing vessel being constructed or operating within the Eighth District has sidelights that are located on the outer edge of the vessel's pilot house or super structure, then the sidelights will be considered at or near the side of the vessel.
- b. Vessel owners/builders/operators/agents, Coast Guard Marine Inspectors, and Third Party Organizations shall use the guidance contained in this policy letter to determine whether a towing vessel is required to apply for a COAC from the Eighth District.

4. QUESTIONS. Any questions regarding this policy letter should be directed to the Eighth District Certificate of Alternative Compliance Coordinator at (504) 671-2105.

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Distribution: All District Eight Sectors, Marine Safety Units & Marine Safety Detachments