



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

P.O. Box 4287 • Houston, Texas 77210-4287 USA
10370 Richmond Ave., Suite 760 • Houston, Texas 77042 USA
Phone: 1/713-292-1945 • Fax: 1/713 292-1946 • www.iadc.org

24 August 2011

[Docket Number USCG-2004-17914]

Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Changes to Domestic Endorsements

To whom it may concern:

The International Association of Drilling Contractors is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States, as well as all MODUs registered in the United States.

The purpose of this letter is to respond to the Coast Guard's 1 August 2011 SNPRM (76 FR 459081) regarding amending the current regulations to incorporate the STCW 2010 Manila amendments and propose other non-STCW changes necessary to reorganize, clarify and update these regulations.

IADC fully supports the Coast Guard's actions to update the regulations to reflect the 2010 amendments to the STCW Convention and Code. We offer the following comments and recommendations regarding this proposed rulemaking for your consideration:

10.107 Definitions:

Designated Medical Examiner: This means a licensed physician, licensed physicians assistant or license nurse practitioner *who has been trained and approved* to conduct medical and physical examinations of merchant mariner.

- IADC believes that additional clarification is required regarding the extent of training, the approval process, and the bodies that would be accepted for the licensing of these medical professionals by the USCG. It could be a monumental task for the USCG to

train and approve the untold number of medical professionals that conduct medical and physical exams for mariners. Additionally, as many mariners reside or serve extended time periods outside the U.S., provisions will need to be made for approval of foreign medical professionals for these exams.

Lifeboatman and Lifeboatman-limited: These two terms apply to the operations of the survival crafts and equipment on board vessels that have lifeboats installed and those that do not.

- What procedures will the USCG use to rectify the credentials that many mariners currently hold that specify particular applications of the Lifeboatman endorsement (*e.g.*, LB (OSV), LB (MODU), LB (Fishing Vessel), etc.)

10.109 Classification of Endorsements

(b) Rating endorsements: This section specifies Able Seaman that includes the moniker: Unlimited, Limited, Special, Special (OSV), Sail, or Fishing Industry.

- The USCG has failed to identify how the rating “AB (MODU),” which is recognized and listed in the Marine Safety Manual, will be affected by the proposed rulemaking action. This should be specified.

10.409 Coast Guard-accepted Quality Standard System (QSS) organizations

33 USC 9701: The Coast Guard has not specified any user fees for the program that would be established to conduct audits, review programs and issue letters of acceptance to QSS organizations.

- Will there be user fees for this program?

11.201 General requirements for domestic and STCW Officer Endorsements

(h)(1) Firefighting certificate: Mariners, who completed the course within the previous 5 years, must *provide evidence* of maintaining the standard of competence in accordance with the firefighting requirements for the credential sought.

- IADC believes that clarification should be provided regarding the nature of the “evidence” the mariner is required to provide. Would this be met by a specified period of sea time with participation in on-board drills?

11.470 Domestic Officer Endorsements as offshore installation manager

(b)(2)(ii) Documentation consistent with those required by the *Minerals Management Service*.....

- This agency name (Minerals Management Service) needs to be revised to reflect the current agency title at the time the regulations are finalized.

11.903 Officer endorsements requiring examinations

(a) The following officer endorsements require examination for issuance: 1 thru 34 are listed.

- IADC finds only deck and engineer officer credentials listed. However, the engineering credentials do specify Chief engineer (MODU) and Assistant Engineer (MODU). Is it implied by their omission that the remaining MODU credentials (*e.g.*, OIM, BS, BCO) do not require an examination. Please confirm that this is the case.

12.409 General requirements for lifeboatman-limited endorsements

(a) General- states that “*Every person* on board vessels fitted with liferafts, but not fitted with lifeboats, must hold an MMC or MMD endorsed as lifeboatman or as lifeboatman-limited.”

- IADC believes that the phrase “Every person” should be replaced by “Those serving under the authority of a rating endorsement as lifeboatman-limited.” IADC does not believe that every person on board should be required to have this endorsement.

15.520 Mobile Offshore Drilling Units (MODUs)

(e) States that “a drillship must be under the command of an individual who holds a license or MMC officer endorsement as master. When the drillship is on location, the individual in command must hold a license as master endorsed as OIM or an MMC with master and OIM officer endorsements.”

- IADC notes that Appendix I to the Coast Guard/BOEMRE Joint Investigation Team preliminary Report of Investigation into the Circumstances Surrounding the Explosion, Fire, Sinking and Loss of the Eleven Crew Members Aboard the MOBILE OFFSHORE DRILLING UNIT *DEEPWATER HORIZON* (*Potential Legal Issues Associated with Vessels Employing Dynamic Positioning Systems*, COMDT (CG-0941) memo 16712, dtd 11 Feb 2011) has concluded that a dynamically positioned (DP) drillship is never “on location.” IADC therefore concludes from the proposed wording that a DP drillship master would not require an OIM endorsement. IADC believes this is neither intended nor appropriate. The Coast Guard should review the phrasing of this regulation in consideration of the Commandant’s final action on the Joint Investigation Team report.

(i) States that “the OCMi issuing the MODU COI may authorize the substitution of a chief or assistant engineer (MODU) for a chief or assistant engineer, respectively on a self-propelled or propulsion assisted surface unit, except drillships. The OCMi may also authorize the substitution of an assistant engineer (MODU) for AE on drillships.”

- IADC asserts that the USCG should develop a career path for Chief Engineer (MODU) and Assistant Engineer (MODU) mariners who meet the required STCW requirements, and complete the required service on self-propelled or propulsion assisted surface units, especially drillships, so that they can obtain an equivalent or similar unlimited license.

15.705 Watches

(b) This section includes the Coast Guard's interpretation of the term "sailor," which means those members of the deck department, other than officer, whose duties involve the mechanics of conducting the ship on its voyage..."

- IADC recommends that the term "sailor" be added to the definition section rather than secluded in a portion of a specific regulation.

IADC appreciates the opportunity to provide a response to this proposed rulemaking and requests that our comments be given due consideration. If you have any questions about these comments or recommendations, please contact me by phone at (713) 292-1945, ext. 207.

Sincerely,



John Pertgen
Assistant Director, Offshore Technical and Regulatory Affairs