



# 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

31 October 2011

[Docket Number USCG-2011-0662]

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: Amendment of Marine Safety Manual, Volume III (Cancellation of Policy Concerning Issuance of AB-MOU credential)

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 29 September 2011 Notice of proposed policy change (76 FR 60511) regarding the USCG's consideration of cancellation of its policy concerning the issuance of Merchant Mariner Credentials endorsed as Able Seaman-Mobile Offshore Unit (AB-MOU).

IADC offers the following comments and recommendations regarding this proposed policy change for your consideration:

## ***Industry Viewpoint***

A meeting of our membership was held regarding this proposed policy change. It was the consensus of the meeting that the Coast Guard should NOT cancel the current AB-MOU policy without concomitant changes to other Coast Guard policies.

Only if the Coast Guard revises its guidance on crewing of non-self-propelled (NSP) MODUs, to remove the suggestion that ABs must be included in the crew complement, would our membership support the proposed policy change.

### ***Crewing Requirements***

This proposed policy change fails to acknowledge the impact that it would impose on the crewing requirements for AB positions, especially on non-self-propelled MODUs. 46 USC 7312 only allows 50 percent of the AB positions to be filled with AB-Limited credentialed mariners, thus the remaining AB positions must be filled by AB-Unlimited credentialed mariners. Though not viewed by our membership as a major adjustment for self-propelled MODUs, this would create a great burden for NSP MODUs, which would now be required to locate and employ additional AB-Unlimited mariners, a scarce commodity in the present merchant marine, to fulfill half of their AB complement on board.

Should this proposed policy change move forward, IADC recommends that the Coast Guard re-evaluate the need for the AB position in the crew complement on NSP MODUs, as allowed by 46 USC 8101, based on the specialized nature of the MODU.

### ***Duties and Responsibilities***

On NSP MODUs, our membership indicates that individuals employed on their units, in order to fulfill the requirements of their unit's Certificates of Inspection, are not placed on watch and are performing no watch-standing duties commensurate with the position of an Able Seaman (AB) on traditional merchant vessels.

In contrast, we would note that the entire offshore industry, and in particular the drilling sector, has seen an ever-increasing use of Dynamic Positioning (DP). As a result, the traditional duties and responsibilities of an individual serving as an AB, such as helmsman, lookout and line-handler on self-propelled DP MODUs, have also changed.

IADC questions the continued need for the AB position on MODUs, both DP self-propelled and non-self-propelled. We recommend that the Coast Guard join with our membership to conduct a review of both the "actual" and "USCG expected" duties and responsibilities for all mariners obtaining credentials and serving under those credentials on a MODU, especially ABs.

### ***Renewal Clarification***

The current renewal requirements for an AB-MOU credential are listed in the Marine Safety Manual Volume III. Therein it states that experience in the deck department of a MODU, which includes serving in the positions of roustabout, tool pusher, rig superintendent, driller, derrickman, or crane operator, is considered by the Coast Guard as creditable deck service, even if the rig is temporarily bottom bearing.

Should the proposed policy change be adopted, it is unclear to IADC what renewal requirements would be applied to those mariners serving on NSP MODUs who previously were certified as an AB-MOU and would then be reissued an AB-Limited replacement credential.

Based on the current regulations and policies, the renewal requirement that mariners would have to meet for their "newly attained" AB-Limited credential (46 CFR 10.227) would be one of the

four listed below. IADC has provided comments for each of the listed requirements as they would apply to ABs on NSP MODUs.

Professional requirements for credential renewal	IADC comments
1. One year of sea service;	This is not attainable on NSP MODUs.
2. Pass a comprehensive open book exercise covering the general subject matter of their credential;	In addition to the added expense of sending each mariner for this exercise, IADC is concerned that these mariners may be tested in unfamiliar areas, based on the duties and responsibilities and the experience they would obtain on MODUs.
3. Complete a refresher training course; or	This will require significant additional costs and time to complete for each mariner.
4. Present evidence of employment in a position closely related to the operations, construction or repair of vessels for at least three of the previous five years.	IADC seeks confirmation that employment in the same MODU deck positions as listed in MSM Volume III for AB-MOU ( <i>i.e.</i> , roustabout, tool pusher, rig superintendent, driller, derrickman, or crane operator) will continue to be acceptable to meet this requirement.

IADC appreciates the opportunity to provide a response to this proposed policy change 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. 203.

Sincerely,



John Pertgen  
Assistant Director, Offshore Technical and Regulatory Affairs