

U.S. Department of
Homeland Security

United States
Coast Guard



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16721
CG-MMC Policy Letter
No. 03-19
JUN 07 2019

From: M. Medina
COMDT (CG-MMC)

A handwritten signature in blue ink, appearing to read "M. Medina".

To: National Maritime Center

Subj: RENEWAL OF ENDORSEMENTS AS RADAR OBSERVER

1. Purpose. This policy letter provides guidance for renewal of endorsements as Radar Observer (Unlimited), Radar Observer (Inland), and Radar Observer (Rivers).
2. Action. The Coast Guard will use 46 CFR 11.480 and this policy as guidance when evaluating whether mariners have qualified to renew a radar observer endorsement.
3. Directives Affected. None.
4. Background. The Coast Guard published a final rule titled "Amendments to the Marine Radar Observer Refresher Training Regulations." The rule amends the requirements for renewal of a radar observer endorsement for mariners who have at least one year (360 days) of relevant service in the previous five years or have taught a Coast Guard approved or accepted radar course at least twice within the past five years.
5. Discussion.
 - a. Under the new rule, to renew a radar observer endorsement, a mariner must provide evidence of one of the following:
 - 1) Completing an appropriate approved or accepted original, refresher, or recertification course (46 CFR 11.480(d));
 - 2) Meeting the requirements in 46 CFR 10.227(e)(1)(v) of having instructed a Coast Guard approved or accepted radar course at least twice within the past five years (46 CFR 11.480(f));
 - 3) Having at least one year of relevant sea service within the last five years in a position that routinely uses radar for navigation and collision avoidance purposes (46 CFR 11.480(g)).
 - b. Mariners will be considered to have met the requirement in 46 CFR 11.480(g) for relevant service routinely using radar for navigation or collision avoidance if they have at least one year of service as master or mate in the previous five years that was obtained

on the following vessels that are required to be fitted with radar, tonnage thresholds expressed in terms of “gross tons” are applied using GRT, if assigned, and GT ITC if GRT is not assigned:

- 1) Tankships of 1,600 gross tons or more subject to inspection under 46 CFR Subchapter D in ocean or coastwise service (46 CFR 32.15-30);
 - 2) Passenger vessels of 1,600 gross tons or more subject to inspection under 46 CFR Subchapter H in ocean or coastwise service (46 CFR 77.09-1);
 - 3) Cargo and miscellaneous vessels of 1,600 gross tons or more subject to inspection under 46 CFR Subchapter I in ocean or coastwise service (46 CFR 96.25-1);
 - 4) Offshore supply vessels (OSVs) over 100 gross tons subject to inspection under 46 CFR Subchapter L (46 CFR 130.310);
 - 5) Public nautical school ships of 1,600 gross tons or more subject to inspection under 46 CFR Subchapter R in ocean or coastwise service (46 CFR 167.40-40); and
 - 6) Oceanographic research vessels of 1,600 gross tons or more subject to inspection under 46 CFR Subchapter U over in ocean or coastwise service (46 CFR 195.17-1).
- c. Mariners who have served on vessels other than those listed in paragraph (b) above, or in capacities other than master or mate should provide documentation of their relevant service on a vessel equipped with radar in a position in which they routinely used radar for navigation and collision avoidance purposes.
- d. Mariners who have served as a pilot who are seeking to renew a radar observer endorsement should provide a letter from a pilot’s association indicating that the vessels piloted were equipped with radar, and that radar was used by the pilot for navigation and collision avoidance purposes (46 CFR 10.232(a)(6)).
- e. Service on vessels that do not get underway or occasionally get underway for short voyages will only be credited for days the vessel was underway.
- f. Mariners who cannot provide evidence of serving as an instructor in an approved or accepted radar course or of having at least one year of relevant service in the previous five years must provide evidence of having completed an approved or accepted original, recertification, or refresher course appropriate to the radar observer endorsement being renewed (46 CFR 11.480(d)) within five years of application submission.
- g. Mariners applying for renewal of an MMC who do not provide evidence of meeting the renewal requirements of 46 CFR 11.480(d), (f), or (g) will not have a radar observer endorsement placed on their MMC (46 CFR 11.480(h)).
- h. Mariners may have a radar endorsement added or restored to their MMC at any time upon application to the National Maritime Center.
- i. This rule will become effective on July 22, 2019.

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- j. Until July 22, 2024, a mariner may serve in a position in which they are required by 46 CFR 15.815(a), (b), or (c) to hold an endorsement as Radar Observer by presenting evidence of completion of an appropriate Coast Guard-approved radar course within the previous 5 years. An appropriate course will be one approved for a Radar Observer endorsement that is valid for the waters upon which the vessel is operating (unlimited, inland, or rivers). After July 22, 2024, all mariners must hold an endorsement as Radar Observer in order to serve as:
- 1) Deck officer, including Master, on a vessel that is over 300 GRT and required to be fitted with radar;
 - 2) Pilot on a vessel that is over 300 GRT and required to be fitted with radar; or
 - 3) Master or Mate onboard a towing vessel of 8 meters (26 feet) or more in length equipped with radar.
6. **Disclaimer.** While the guidance contained in this document may assist the industry, public, Coast Guard, and other Federal and State regulators in applying statutory and regulatory requirements the guidance is not a substitute for applicable legal requirements nor is it itself a regulation.
7. **Changes.** This policy letter will be posted on the web at <https://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy-CG-5P/Commercial-Regulations-standards-CG-5PS/Office-of-Merchant-Mariner-Credentialing/CG-MMC-2/CG-MMC-2-New-Policies/> and the NMC website www.uscg.mil/nmc in the Policy and Regulation tab. Changes to this policy will be issued as necessary. Suggestions for improvement of this policy should be submitted in writing to Commandant, U.S. Coast Guard Headquarters, Office of Merchant Mariner Credentialing (CG-MMC) at the address listed on the first page.

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