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March 16, 2020

Rear Admiral Richard Timme
Assistant Commandant for Prevention Policy (CG-5P)
U.S. Coast Guard
2703 Martin Luther King Jr Ave., SE
Washington, DC 20593-7501

Re: Request for Temporary Relief for Expiring Vessel and Mariner Documentation

Dear Admiral Timme:

I am writing to request that the U.S. Coast Guard (USCG) consider issuing the below-listed extensions in order to assist the maritime industry exercise social distancing in order to “flatten the curve” of COVID-19 spread.

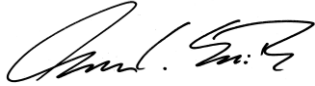
As you are well aware, Federal and local governments have recommended, directed, or even required schools, businesses, and other entities take efforts at “Flattening the Curve” and preventing further spread of the COVID-19 virus by instituting social distancing, limiting person-to-person contact, or closing altogether. In many ways the maritime industry is well situated to comply and work through these restrictions as many of our marine assets operate as self-contained units or are operated in a way where exposure to outside contact is minimal. However, there are certain USCG requirements that cause mariners, contractors, and USCG personnel to increase their exposure to individuals, thereby increasing the risk of infection to these groups. To lessen this risk, the USCG should, to the extent safe and practical, extend the time period where these requirements are enforced, thereby minimizing everyone’s exposure while allowing commerce to continue where it can. Specifically, we request:

1. All vessel Certificates of Inspection (COI) set to expire in the next 60 days and requiring a USCG or third party inspection should be extended through May 17, 2020. A proactive extension of COIs will provide for the safety of USCG personnel and mariners by preventing their exposure to outside persons during the height of the outbreak.
2. The USCG should utilize its authority under 46 U.S.C. 7507 and 46 U.S.C. 7508 to extend national endorsements and medical certificates set to expire in the next 60 days which require an in-person course, exam, or medical office visit through May 17, 2020.
3. Extensions similar to the extensions described in request two should be made for all similarly situated Standards of Training, Certification, and Watchkeeping (STCW) credentials.
4. Related, any Approval to Test (ATT) or Additional Information (AI) letter deadlines should be extended if these instruments direct the individual to participate in in-person classes, exams, or medical evaluations.

We sincerely appreciate your time and attention to these issues which significantly impact the maritime industry; an industry which is critical for the nation's economic wellbeing, its national defense, and for the employment of thousands of men and women responsible for operating commercial vessels.

We would be pleased to clarify or discuss our request if it would help reach a positive conclusion. I stand ready to assist in any way and can be reached at Aaron.Smith@offshoremarine.org or (504) 528-9411.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron C. Smith". The signature is fluid and cursive, with the first name "Aaron" being the most prominent part.

Aaron C. Smith
President and CEO