



# Marine Safety Information Bulletin

Commander  
U.S. Coast Guard  
Sector Delaware Bay  
1 Washington Ave  
Philadelphia, PA 19147

MSIB Number: 11-18  
Date: February 27, 2018  
Contact: Inspections Division Staff  
Phone: (215) 908-9827  
E-Mail: [domesticvessels@uscg.mil](mailto:domesticvessels@uscg.mil)

---

## INITIAL CERTIFICATE OF INSPECTION ISSUANCE FOR SUBCHAPTER M VESSELS UTILIZING THE TOWING SAFETY MANAGEMENT SYSTEM OPTION

This MSIB is issued to address the issuance of an initial Certificate of Inspection (COI) for 46 CFR Subchapter M inspected towing vessels that utilize the Towing Safety Management System (TSMS) option. Those seeking an initial COI by utilizing the Coast Guard option will be addressed in a future MSIB.

Those companies choosing the TSMS option must have a Coast Guard approved third party organization (TPO) conduct independent verifications to assess whether their TSMS complies with the requirements of subchapter M. Sector Delaware Bay will be issuing COIs in accordance with this MSIB effective immediately.

Owners and operators electing to utilize the TSMS option may submit requests for COIs to the local Officer in Charge, Marine Inspections (OCMI) along with the below required information, as outlined in 46 CFR 136.210. NOTE: Priority will be given to vessels that have a valid Uninspected Towing Vessel (UTV) decal.

Submission requests must include the following to initiate the COI process:

1. Thirty days prior to the vessel undergoing the initial inspection for certification, owners and managing operators must submit Form CG-3752, "Application for Inspection of U.S. Vessel," to the cognizant OCMI where the inspection will take place.
2. Vessel Particulars, including length, beam, depth, hull construction, etc.
3. A manning proposal.
4. Vessel route and operating conditions.
5. TSMS Certificate issued by a TPO **at least six months prior** to the scheduled initial COI issuance date. Compliance with ISM may also be used IAW CG-CVC Policy Letter 17-02 dated May 24, 2017, "Use Of Existing Safety Management Systems To Obtain An Initial Certificate Of Inspection Under 46 CFR Subchapter M."
6. Objective evidence of compliance with the TSMS certificate.
7. A report in accordance with 46 CFR 137.135 and 137.202(a) stating the vessel's structure, stability, and essential systems comply with Subchapter M, including a statement that the vessel is fit for the intended route and service.
8. A valid Certificate of Documentation.
9. If applicable, Fresh Water Intent Letter for hull exam intervals as per 46 CFR 137.300 (a).

NOTE: Objective evidence may include, but is not limited to, summaries of TPO independent verifications, audit findings, marine surveyor reports, and/or professional engineer certification.

At OCMI discretion, towing vessels possessing a valid UTV decal issued in the Sector Delaware Bay zone may not require Coast Guard Marine Inspectors to physically attend the vessel prior to COI issuance.

If you have any questions regarding the contents of this bulletin or to schedule a Subchapter M Vessel inspection, please contact the Inspections staff at (215) 908-9827 or [domesticvessels@uscg.mil](mailto:domesticvessels@uscg.mil).

A handwritten signature in black ink, appearing to read 'S. E. Anderson', with a long horizontal flourish extending to the right.

S. E. Anderson  
Captain, U.S. Coast Guard  
Officer in Charge, Marine Inspections  
Sector Delaware Bay