

U.S. Department of  
Homeland Security

United States  
Coast Guard



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United States Coast Guard

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16714/160.011/GEN  
March 6, 2003

Department of the Navy  
Commander Military Sealift Command  
914 Charles Morris CT SE  
Washington Navy Yard DC 20398-5540  
Attn: K. D. Baetsen

Dear Mr. Baetsen:

This is in response to your 20 December 2003 letter, requesting confirmation as to the acceptability of your plan for compliance with NVIC 6-02 Amendments to SOLAS Chapter II-2, in particular with reference to the carriage of Emergency Escape Breathing Devices (EEBDs) and your computer based maintenance plan. These items were addressed during a 3 March 2003 meeting with your representatives at USCG headquarters, as summarized below.

You requested confirmation that EEBDs manufactured by Scott Aviation and OCENCO are acceptable to the USCG. The USCG does not intend to type approve, i.e. issue certificates of approval for, EEBDs. Instead, EEBDs that are certificated by NIOSH (under approval schedule TC-13-F) and meet IMO MSC/Circ. 849 will be accepted as meeting the 1998 Amendments to SOLAS Chapter II-2. EEBDs manufactured by Scott Aviation and OCENCO that meet these conditions are therefore acceptable.

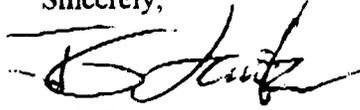
You requested clarification with respect to SOLAS II-2/13.4.3.2, requiring the number and location of the EEBDs to be indicated on a vessel's fire control plan. This requirement applies only to EEBDs in the machinery spaces. Since a number of MSC ships have recently updated their fire control plans to meet all anticipated SOLAS amendments except for the location of EEBDs, you requested an extension until December 2004 for updating the fire control plans again to include EEBDs for those ships which meet all other requirements. Your request is granted on the condition that stickers showing the location of machinery space EEBDs are affixed to the fire control plans.

We also confirm that, in principle, your computer based maintenance plan, Ship Automated Maintenance Plan (SAMM), meets the intent of SOLAS II-2/14. Since such plans are of necessity ship-specific, final acceptance rests with the local OCMI.

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Questions concerning this subject may be directed to the attention of Mr. K. Wahle or Mr. R. Eberly at the above address, telephone or fax number.

Sincerely,



J. G. LANTZ  
Chief, Lifesaving and Fire Safety Standards Div.  
Office of Design and Engineering Standard  
By direction of the Commandant