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Coast Guard

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NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 1-94

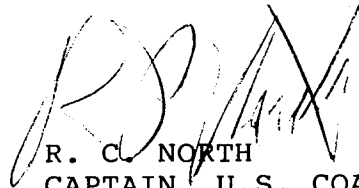
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Subj: MARKING OF LIFE PRESERVERS AND PFDs

1. PURPOSE. This circular is to be used by vessel operators and Coast Guard marine inspectors to clarify marking requirement changes for life preservers and personal flotation devices (PFDs).
2. BACKGROUND.
 - a. Present regulations require all life preservers beginning with approval numbers 160.002 or 160.055 to be marked Type I personal flotation device (PFD). Prior to October 1973, most life saving devices were marked either Type I or Type II in addition to an appropriate approval number. Type I meant standard and Type II meant nonstandard construction. Both standard and nonstandard life saving devices approved under 46 CFR 160.002 or 160.055 were for use on inspected vessels.
 - b. In October 1973 the current five "performance type" categories listed in enclosure (1) and the term Personal Flotation Device (PFD) were adopted. Only the type designation changed, the approval numbers remained the same. Performance Type I life preservers currently made to meet carriage requirements on non-SOLAS inspected vessels have approval numbers beginning with 160.002 or 160.055. Devices with approval numbers beginning with 160.003, 160.004, and 160.005 meet these same carriage requirements, but were never given a type designation and are no longer manufactured. Type designation is documented in enclosure (1), which is a table of equivalents that was in the Code of Federal Regulations until August 6, 1990. This table is still valid. It was deleted only because it was believed to be no longer needed.
3. DISCUSSION. Recent questions from Officers in Charge, Marine Inspection (OCMIs) indicate some confusion remains concerning the marking of life preservers, life saving devices and PFDs. Specifically, how can an inspector tell if a device manufactured prior to October 1973 is acceptable for use on an inspected vessel? On these older devices, the first part of the approval number is the key to determining their "performance type" documented in enclosure (1). Most flotation devices approved under the old standard / nonstandard "Type" classification have been removed from service due to their deterioration with age and use. However, as the following cases show, some remain in serviceable condition and require particular attention as to their intended use.
 - a. The first case involved a model AK-I, adult life saving device, Approval Number 160.047/324/0. This device is approved as a buoyant vest and marked as Type I. This device is a standard construction, performance Type II PFD which is not approved for use on inspected commercial vessels.

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- b. The second case involved an adult life preserver, Approval Number 160.055/79/0. This device was approved as a life preserver and marked as Type II. This life saving device is a nonstandard construction, performance Type I PFD, which is approved for use on all non-SOLAS commercial vessels.
4. IMPLEMENTATION. Vessel operators and Coast Guard marine inspectors are to pay particular attention to life preservers and PFDs manufactured prior to October 1973 to ensure carriage requirements are met.



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End: (1) Former 33 CFR, Table 175.23 personal flotation device equivalents

Former Subpart 175.23 Personal flotation device equivalents.

Table 175.23 lists devices that are equivalent to personal flotation devices.

TABLE 175.23

Devices marked—	Are equivalent to performance type
160.002 Life preserver.....	Type I personal flotation device.
160.003 Life preserver.....	Do.
160.004 Life preserver.....	Do.
160.005 Life preserver.....	Do.
160.009 Ring life buoy ¹	Type IV—Personal Flotation Device.
160.047 Buoyant vest.....	Type II personal flotation device.
160.048 Buoyant cushion.....	Type IV personal flotation device.
160.049 Buoyant cushion.....	Do.
160.050 Ring life buoy.....	Do.
160.052 Buoyant vest.....	Type II personal flotation device.
160.053 Work vest.....	Type V personal flotation device.
160.055 Life preserver.....	Type I personal flotation device.
160.060 Buoyant vest.....	Type II personal flotation device.
160.064 Special purpose water safety buoyant devices.	A device intended to be worn may be equivalent to type II or type III. A device that is equivalent to type III is marked "Type III Device—may not turn unconscious wearer". A device intended to be grasped is equivalent to type IV.

¹ 46 CFR Subpart 160.009 has been revoked. Type IV PFDs previously approved under that subpart may be used as long as they are in good and serviceable condition.

[CGD 72-120R, 38 FR 8115, Mar. 28, 1973, as amended by CGD 80-155b, 47 FR 10534, Mar. 11, 1982]