

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 10-83  
*Electronic Version for Distribution via the World Wide Web*

Subj: Stability Approval and the Issuance of Stability Letters

1. **PURPOSE.** The purpose of this Circular is to advise the marine industry, vessel operating personnel, and Coast Guard marine safety personnel of a change in procedure regarding the issuance of stability letters and stability restrictions to commercial vessels.
2. **APPLICATION.** This new procedure is effective on the publication date and is applicable to all U. S. flag vessels that are required to have the stability approval of the Coast Guard for the purpose of either inspection for certification or load line assignment.
3. **DISCUSSION.**

**Review of Current Practice**

- a. The stability review of a small passenger vessel 65 feet or less in length is normally conducted by the Officer in Charge, Marine Inspection (OCMI) when required by 46 CFR Subchapter T. If the stability of the vessel is found satisfactory, the OCMI issues a stability letter to the owner to be posted on board the vessel.
- b. The stability review of any other vessel is normally conducted by one of the Coast Guard's three field merchant marine technical (mt) offices (New York, New Orleans, or San Francisco). If the stability of the vessel is found satisfactory, the mmt branch chief, acting on behalf of the district commander, forwards a draft stability letter to the cognizant OCMI. The vessel's stability letter, signed by the OCMI, is then issued to the owner to be posted on board the vessel.
- c. Upon the completion of the stability review of unmanned barges and certain other classes of vessels, the field mmt office may however decide that a stability letter is not necessary or is inappropriate. In that case, the mmt office specifies what loading restrictions are to be placed on the load line certificate, the certificate of inspection, or both.
- d. The load line regulations (46 CFR 42.09-1(a)) require that "When stability limitations for a vessel are prescribed, the assigning authority shall furnish the master the vessel's maximum draft permitted and other conditions, including reference to the Commandant approved operating stability features, which may be applicable." When an mt office completes the stability review of a vessel, it authorizes the load line assigning authority (normally the American Bureau of Shipping) to issue a load line certificate. If the vessel is to be certificated by the Coast Guard and an OCMI is going to issue a stability letter, the assigning authority is directed by the mmt office to reference the date of the stability letter on the face of the load line certificate and attach a copy to it. It is then the responsibility of the OCMI to send a copy of the stability letter, when issued, to the assigning authority.

If the vessel is not to be certificated by the Coast Guard or is not to receive a stability letter issued by the OCMI, the field mt office advises the assigning authority of specific restrictions to be placed on the face of the load line certificate or issues a stability

information sheet to the vessel and sends a copy to the assigning authority to be referenced on and attached to the load line certificate.

- e. The procedure described in paragraph d. has been cumbersome, resulting in improper information being referenced on load line certificates. In order to improve on the procedure, this Circular permits the Coast Guard office reviewing the stability of the vessel to issue the appropriate stability information for the vessel. In essence, OCMI's will normally only be issuing stability letters to certain small passenger vessels 65 feet or less in length. The branch chiefs of the field mt offices will normally issue stability letters or other appropriate stability information to all other vessels and will issue the stability authorization for all load lines.

#### 4. ACTION.

- a. Officers in Charge, Marine Inspection will continue to issue stability letters to the owners of small passenger vessels 65 feet or less in length as required by 46 CFR Part 170, Subpart D. If however, the OCMI requests that an mmt office conduct the stability evaluation, the mt office may then issue the stability letter.
- b. Branch chiefs of the New York, New Orleans, and San Francisco merchant marine technical offices will normally review the stability of each other vessel and -
  - (1) If the vessel is inspected and load lined; issue a stability letter to the owner of the vessel, send a copy to the OCM' to be referenced on the certificate of inspection, and direct the load line assigning authority to indicate the date and issuing office on the face of the load line certificate.
  - (2) If the vessel is inspected but not load lined; issue a stability letter to the owner of the vessel and send a copy to the OCM' to be referenced on the certificate of inspection.
  - (3) If the vessel is load lined but not inspected; issue a stability letter to the owner of the vessel and send a copy to the assigning authority directing them to attach it to the load line certificate and to indicate the date and issuing office on the face of the certificate.

If the loading restrictions are brief (i.e. 25 words or less), the mt office may elect not to issue a stability letter in which case the OCM' and the load line assigning authority will be advised of any restrictions to be placed on the certificate of inspection or load line certificate as appropriate. The restriction may be as simple as requiring that the vessel be operated in accordance with an approved operating manual.

Enclosures (1) through (4) are samples of letters which may be used by the mmt offices for informing the OCM', the assigning authority, and the owner of the appropriate stability information for the vessel.

- c. OCMI's will enter the date of the stability letter in the appropriate space on the vessel's certificate of inspection.

- d. Assigning authorities will follow the directions received from the field ~t offices regarding the information to be placed on or attached to load line certificates.
- e. If a revised stability letter is issued to an existing vessel, the procedures of this Circular will be followed.
- f. The provisions of this Circular do not supersede an OCMI's authority to issue a stability letter to any vessel in unusual circumstances or where it is more expeditious to do so.
- g. The provisions of this Circular do not modify procedure B for the submitting of stability plans and calculations for approval.

Encl: (1) SAMPLE LETTER AUTHORIZING A LOAD LINE AND ISSUING A STABILITY LETTER (INSPECTED VESSEL)  
 (2) SAMPLE LETTER AUTHORIZING A LOAD LINE AND ISSUING A STABILITY LETTER (UNINSPECTED VESSEL)  
 (3) SAMPLE LETTER AUTHORIZING A LOAD LINE AND SPECIFYING STABILITY RESTRICTIONS  
 (4) SAMPLE LETTER AUTHORIZING A SUBDIVISION LOAD LINE AND ISSUING A STABILITY LETTER

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ZTC-68

SAMPLE LETTER AUTHORIZING A LOAD LINE AND ISSUING  
A STABILITY LETTER (INSPECTED VESSEL)

16710/ \_\_\_\_\_  
Ser. \_\_\_\_\_

Attention: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Gentlemen:

Subj: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Stability \_\_\_\_\_

Ref: \_\_\_\_\_

Enclosure (1) is approved. The approved lightship data are:

Displacement	_____	Long Tons
VCG	_____	Feet Above the Baseline
LCG	_____	Feet _____ of Amidships

Enclosure (2) is the stability letter for the M/V \_\_\_\_\_.  
It is the owner's responsibility to insure that it is posted under glass  
or other suitable transparent material in the pilothouse of the vessel.

By copy of this letter, the (American Bureau of Shipping) is advised that  
the stability of the M/V \_\_\_\_\_ is considered  
satisfactory for a freeboard assignment of \_\_\_\_\_ feet \_\_\_\_\_ inches. The  
(ABS) is directed to place a statement on the face of the load line  
certificate which states:

"This certificate is valid only so long as the operating restrictions  
in the vessel's stability letter issued by CGGD (mat) and  
dated \_\_\_\_\_ are observed."

Enclosure (3) should be signed by a representative of the owner and  
returned.

Sincerely,

Commander, USCG  
Chief, Merchant Marine Technical Branch  
By direction of the Commander,  
\_\_\_\_\_ Coast Guard District

Encl: (1) Stability Study for the M/V \_\_\_\_\_  
(2) Stability Letter for the M/V \_\_\_\_\_ (orig & one)  
(3) Receipt for Enclosure (2)

Copy to: OCM1, \_\_\_\_\_ w/1 copy encl. (2)  
ABS, NY

SAMPLE LETTER AUTHORIZING A LOAD LINE AND ISSUING  
A STABILITY LETTER (UNINSPECTED VESSEL)

16710/ \_\_\_\_\_

Ser. \_\_\_\_\_

Attention: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Gentlemen:

Subj: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Stability \_\_\_\_\_

Ref: \_\_\_\_\_

Enclosure (1) is approved. The approved lightship data are:

Displacement	_____	Long Tons
VCG	_____	Feet Above the Baseline
LCG	_____	Feet _____ of Amidships

Enclosure (2) is the stability letter for the M/V \_\_\_\_\_.  
It is the owner's responsibility to insure that it is posted under glass  
or other suitable transparent material in the pilothouse of the vessel.

By copy of this letter, the (American Bureau of Shipping) is advised that  
the stability of the M/V \_\_\_\_\_ is considered  
satisfactory for a freeboard assignment of \_\_\_\_\_ feet \_\_\_\_\_ inches. A  
copy of the stability letter has been sent to the (ABS) to be attached to  
the load line certificate.

The (ABS) is directed to place a statement on the face of the load line  
certificate which states:

"This certificate is valid only so long as the operating restrictions  
in the attached stability letter issued by CGCD \_\_\_\_\_ (mt) and  
dated \_\_\_\_\_ are observed."

Enclosure (3) should be signed by a representative of the owner and  
returned.

Sincerely,

Commander, USCG  
Chief, Merchant Marine Technical Branch  
By direction of the Commander,  
\_\_\_\_\_ Coast Guard District

Encl: (1) Stability Study for the M/V \_\_\_\_\_  
(2) Stability Letter for the M/V \_\_\_\_\_  
(3) Receipt for Enclosure (2)

Copy to: ABS, NY w/copy of encl. (2)

SAMPLE LETTER AUTHORIZING A LOAD LINE AND SPECIFYING  
STABILITY RESTRICTIONS

16710/

Ser. \_\_\_\_\_

Attention: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Gentlemen:

Subj: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Stability

Ref: \_\_\_\_\_

Gentlemen:

Enclosure (1) is approved. A stability review of the subject barge, involving a comparison with existing vessels and the calculations submitted, clearly indicates that due to the vessel's proportions and arrangement, more than sufficient stability will be available in all probable loading conditions. Therefore, a stability test is not required.

By copy of this letter, the (American Bureau of Shipping) is advised that the stability of the \_\_\_\_\_ is considered satisfactory for a freeboard assignment of \_\_\_\_\_ feet \_\_\_\_\_ inches. The following restriction shall be placed on the face of the load line certificate and the certificate of inspection:

"The vertical center of gravity of the deck cargo as stowed shall not exceed eight feet above the main deck."

Sincerely,

Commander, USEC  
Chief, Merchant Marine Technical Branch  
By direction of the Commander,  
\_\_\_\_\_ Coast Guard District

Encl: (1) Stability Study for the barge \_\_\_\_\_

Copy to: OCMI, \_\_\_\_\_  
ABS, NY \_\_\_\_\_

SAMPLE LETTER AUTHORIZING A SUBDIVISION LOAD LINE  
AND ISSUING A STABILITY LETTER

16710/ \_\_\_\_\_  
Ser. \_\_\_\_\_

Attention: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Gentlemen:

Subj: \_\_\_\_\_  
\_\_\_\_\_  
Subdivision and Stability

Ref: \_\_\_\_\_

Enclosure (1) is approved. The approved lightship data are:

Displacement	_____	Long Tons
VCG	_____	Feet Above the Baseline
LCG	_____	Feet _____ of Amidships

Enclosure (2) is the stability letter for the M/V \_\_\_\_\_.  
It is the owner's responsibility to insure that it is posted under glass  
or other suitable transparent material in the pilothouse of the vessel.

By copy of this letter, the (American Bureau of Shipping) is advised that  
the subdivision and stability of the M/V \_\_\_\_\_ is  
considered satisfactory for a freeboard assignment of \_\_\_\_\_ feet  
inches. The watertight bulkheads used in satisfying the subdivision  
requirements are located at frames \_\_\_\_\_.  
These bulkheads must be maintained watertight up to the \_\_\_\_\_  
deck. The (ABS) is directed to place a statement on the face of the load  
line certificate which states:

"This certificate is valid only so long as the operating restrictions  
in the vessel's stability letter issued by CCGD (mmt) and  
dated \_\_\_\_\_ are observed."

Subj: Subdivision and Stability

The following additional statement must appear on the face of the Load Line Certificate as required by 46 CFR 46.10-30(c).

"The bulkhead deck used for determining the position of the subdivision load line certified above is \_\_\_\_\_."

Enclosure (3) should be signed by a representative of the owner and returned.

Sincerely,

Commander, USCG  
Chief, Merchant Marine Technical Branch  
By direction of the Commander,  
\_\_\_\_\_ Coast Guard District

Encl: (1) Subdivision and Stability Study for the M/V \_\_\_\_\_  
(2) Stability Letter for the M/V \_\_\_\_\_ (orig & one)  
(3) Receipt for Enclosure (2)

Copy to: USCGI, \_\_\_\_\_ w/1 copy encl. (2)  
ABS, NY