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March 20, 2026

Captain Corydon Heard IV
Chief, Office of Commercial Vessel Compliance
U.S. Coast Guard
2703 Martin Luther King Jr. Avenue Southeast
Washington, DC 20593

Re: Streamlined (Vessel) Inspection
Program (NVIC 02-99)—Request
for Information

Dear Captain Heard:

The American Waterways Operators (AWO) is the tugboat, towboat, and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. As the largest segment of the nation's 40,000-vessel domestic maritime fleet, our industry safely and efficiently moves 665 million tons of cargo each year and enables the flow of goods through ports on the inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; and the Great Lakes. On behalf of our over 300 members, we appreciate the opportunity to comment on the U.S. Coast Guard's request for information to improve its Streamlined Inspection Program (SIP), as explained in Navigation and Vessel Inspection Circular 02-99.

AWO members have extensive experience with the Streamlined Inspection Program (SIP) through the Joint Eight and Ninth District Tank Barge Streamlined Inspection Program (TBSIP) that provides qualified operators of unmanned U.S. tank barges an alternative to traditional Coast Guard inspection under 46 CFR Subchapters D and O. AWO members have also widely adopted an alternative inspection regime under 46 CFR Subchapter M's Towing Safety Management System (TSMS) option, which allows U.S. towing vessel operators to utilize Coast Guard-approved third-party organizations (TPOs) to perform routine surveys and audits. TBSIP and the TSMS option have an established track record of success in ensuring safety and continuous compliance as well as enhancing regulatory and operational efficiency for both the Coast Guard and industry. AWO encourages the Coast Guard to ensure that any changes to the SIP complement TBSIP and the TSMS option and do not create unintended, potentially disruptive consequences for these existing, well-functioning alternative inspection frameworks.

Based on feedback from AWO members, AWO offers the following recommendations for the Coast Guard's consideration. These recommendations build on the regulatory reform

justification of the SIP and support the Trump Administration's goals of prioritizing deregulation, streamlining, and regulatory modernization, promoting affordable and reliable American energy, and revitalizing the domestic maritime industry, as set forth in Presidential Executive Orders 14192, *Unleashing Prosperity Through Deregulation*; 14154, *Unleashing American Energy*; and 14269, *Restoring America's Maritime Dominance*.

1. Expand TBSIP Nationally

- a. We urge the Coast Guard to expand TBSIP beyond tank barges operating in the Heartland and Great Lakes Districts to allow participation by any unmanned U.S.-flag tank barge.

Rationale for Recommendation:

AWO members operating in the Heartland and Great Lakes Districts and participating in TBSIP have experienced meaningful improvements in regulatory flexibility and operational efficiency over traditional Coast Guard inspection. Members report that annual inspections which previously required over a week to complete are now often completed in two to three days and can be conducted at times that Coast Guard marine inspectors' availability is usually limited, such as weekends. Participating companies' ability to schedule these events at a time that is conducive to commercial considerations reduces vessel downtime and increases profitability while maintaining strong safety outcomes.

Given the program's success, AWO believes that these benefits should be available to all U.S.-flag tank barge operators. National expansion of TBSIP would improve regulatory flexibility and consistency, strengthen the risk-based allocation of Coast Guard and industry resources, enhance the competitiveness of U.S.-flag tank barges, and facilitate the prosperity of American businesses and the U.S. energy supply chain across all Coast Guard Districts.

2. Expand Authority of Approved Company Personnel to Clear Deficiencies and Conduct Examinations

- a. We encourage the Coast Guard to consider whether appropriately qualified Coast Guard-approved company personnel could be authorized, under TBSIP, to clear certain categories of deficiencies (e.g., select Form CG-835V items, hull repairs, steel work) and perform additional examinations (e.g. drydock/internal structural examinations, cargo tank internal examinations) rather than requiring a qualified Coast Guard marine inspector to attend the vessel according to the legacy inspection approach.

Rationale for Recommendation:

AWO members report strong safety outcomes under TBSIP and question whether the current deficiency clearance model and inspection authorities for Company TBSIP Barge Examiners fully reflect existing industry capabilities. Some towing vessel operators already rely on trained internal surveyors—particularly those with drydock or steel work qualifications—to certify certain repairs and perform drydock/internal structural examinations under the TSMS option with TPO oversight. Allowing

qualified Coast Guard-approved and designated company personnel to assume additional responsibilities under TBSIP, with appropriate oversight, is consistent with TBSIP's risk-based approach and would increase regulatory flexibility and reduce vessel downtime while maintaining safety. Additionally, an expansion of authority could create further efficiencies for operators of both tank barges enrolled in TBSIP and towing vessels using the TSMS option to use company personnel with the requisite qualifications to perform inspections, examinations, and surveys under both programs.

3. Allow Use of TPOs Under TBSIP and SIP

- a. We recommend that the Coast Guard allow qualified Coast Guard-approved third-party organizations—such as TPOs¹ and recognized classification societies (RCSs)— to perform inspections, drydock/internal structural examinations, and cargo tank internal examinations and to conduct damage surveys and clear deficiencies under the SIP framework.

Rationale for Recommendation:

AWO members believe that permitting a company enrolled in the TBSIP or SIP to utilize TPOs and RCSs under its Company Action Plan (CAP) would improve the program's flexibility and efficiency benefits. The Coast Guard could allow companies to identify a specific surveyor, or surveyors under a specific program with specific qualifications, within the CAP. TPOs and RCSs can offer more availability and geographical coverage than Coast Guard marine inspectors, allowing them to attend vessels more readily and reducing vessel downtime. Further, where operators already use TPOs or RCSs for other Coast Guard-delegated authorities, the ability to leverage that relationship within TBSIP or SIP could facilitate combining activities and reducing duplicative oversight while remaining consistent with SIP's performance-based philosophy.

4. Expansion of TBSIP to Additional Inspected Barge Types

- a. We encourage the Coast Guard to consider allowing U.S.-flag deck barges to enroll in TBSIP as an alternative to traditional Coast Guard inspection under Subchapter I.

Rationale for Recommendation:

AWO members believe the TBSIP framework is well suited to deck barges, which have a similar operational profile but a lower risk profile than tank barges. Permitting deck barge operators to enroll in the TBSIP would relieve them of the burden of creating a new SIP-compliant framework and create efficiencies for companies that operate both tank barges and deck barges. The Coast Guard could conduct a gap analysis to ensure that existing statutory requirements for deck barges under Subchapter I are preserved.

5. Consider Clarifications to Existing TBSIP Definitions and Terminology

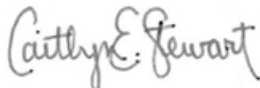
- a. Specific suggested clarifications:
 - i. Clarify designation process for Company TBSIP Barge Examiner.

¹ Organizations approved by the Coast Guard under 46 CFR Part 139.

1. On page 7 of the TBSIP v3.0 Guidance, the definition of a Company TBSIP Barge Examiner states that such personnel must be approved and designated in writing by the TBSIP Homeport OCMI. This idea is further supported on page 20 which states, “Each company shall recommend in writing to the Homeport OCMI trained company employees to serve as TBSIP Barge Examiners. In return, the Homeport OCMI shall designate in writing the Barge Examiners.” However, on page 17, the Guidance states, “Upon recommendation of the company...the Homeport OCMI *may* issue a letter designating the candidate as a Company TBSIP Barge Examiner” [emphasis added], introducing ambiguity as to whether Homeport OCMI designation is mandatory once qualification requirements are met. AWO requests that the Coast Guard clarify the designation process for Company TBSIP Barge Examiners and ensure the designation process is described consistently throughout the Guidance.
- ii. Clarify how temporary minor hull repairs are to be treated for essential system deficiency notification purposes and when 48-hour notification is required.
 1. Page 23 of the TBSIP v3.0 Guidance identifies the watertight hull as an essential system, which would suggest that hull damage could constitute an essential system deficiency requiring notification to the Coast Guard within 48 hours. However, Section VI of the Guidance (page 33) states that company personnel do not need prior Coast Guard approval to perform temporary minor hull repairs that meet defined criteria. AWO requests that the Coast Guard clarify whether 48-hour notification is required for hull damage requiring only temporary minor repair that does not otherwise need prior Coast Guard approval.
- iii. Reevaluate list of systems where temporary minor repairs are not allowed without OCMI permission.
 1. The list on page 34 of the TBSIP v3.0 Guidance is vague and potentially overbroad and should be reevaluated.

Thank you for the opportunity to comment on this request for information. AWO would be happy to provide any additional information or participate in further discussions as needed.

Sincerely,



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