



DEPARTMENT OF HOMELAND SECURITY

Coast Guard

46 CFR Parts 11 and 12

[Docket No. USCG-2025-0392]

RIN 1625-AC48

Clarification of Certain Mariner Training Requirements

AGENCY: Coast Guard, Department of Homeland Security (DHS).

ACTION: Notice of proposed rulemaking.

SUMMARY: The Coast Guard proposes removing six requirements related to endorsements for the International Convention on Standards of Training, Certification, and Watchkeeping for Seafarers, 1978, as amended, and the Seafarer’s Training, Certification, and Watchkeeping Code. Changes would affect Masters and Officers in Charge of a Navigational Watch of less than 500 GT in near-coastal waters; Officers in Charge of an Engineering Watch, Designated Duty Engineers, and Electro-technical Ratings of 750 kW/1,000 HP or more. This proposed action includes technical revisions to remove duplicative or outdated language from the regulatory text, reduces regulatory burdens, and promotes equivalent compliance standards with international requirements.

DATES: Comments and related material must be received by the Coast Guard on or before [INSERT DATE 90 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER].

ADDRESSES: You may submit comments identified by docket number USCG-2025-0392 using www.regulations.gov. See the “Public Participation and Request for Comments” portion of the **SUPPLEMENTARY INFORMATION** section for further instructions on submitting comments. This notice of proposed rulemaking with its plain language proposed rule summary of 100 words or less will be available in this same

docket.

Collection of information. Submit comments on the collection of information discussed in **Section VI., Regulatory Analyses**, of this preamble both to the Coast Guard's online docket and to the Office of Information and Regulatory Affairs (OIRA) in the White House Office of Management and Budget (OMB), using their website www.reginfo.gov/public/do/PRAMain. Comments sent to OIRA on the collection of information must reach OMB on or before the comment due date listed on their website.

FOR FURTHER INFORMATION CONTACT: For information about this document, call or email Ms. Megan Johns Henry, Office of Merchant Mariner Credentialing, Coast Guard; telephone 571-610-3303, email Megan.C.Johns@uscg.mil.

SUPPLEMENTARY INFORMATION:

Table of Contents for Preamble

- I. Public Participation and Request for Comments
- II. Abbreviations
- III. Executive Summary
 - A. Purpose
 - B. Legal Authority
 - C. Summary of Major Provisions
 - D. Benefits
- IV. Background
- V. Discussion of Proposed Rule
- VI. Regulatory Analyses
 - A. Regulatory Planning and Review
 - B. Small Entities
 - C. Assistance for Small Entities
 - D. Collection of Information
 - E. Federalism
 - F. Unfunded Mandates Reform Act
 - G. Taking of Private Property
 - H. Civil Justice Reform
 - I. Protection of Children
 - J. Indian Tribal Governments
 - K. Energy Effects
 - L. Technical Standards
 - M. Environment

I. Public Participation and Request for Comments

The Coast Guard views public participation as essential to effective rulemaking

and will consider all comments and material received during the comment period. Your comment can help shape the outcome of this rulemaking. If you submit a comment, please include the docket number for this rulemaking, indicate the specific section of this document to which each comment applies, and provide a reason for each suggestion or recommendation.

Submitting comments. We encourage you to submit comments through www.regulations.gov. To do so, go to www.regulations.gov, type USCG-2025-0392 in the search box and click “Search.” Next, look for this document in the **Search Results** column, and click on it. Then click on the **Comment** option. If you cannot submit your material by using www.regulations.gov, call or email the person in the **FOR FURTHER INFORMATION CONTACT** section of this proposed rule for alternate instructions. We review all comments received.

Viewing material in docket. To view documents mentioned in this proposed rule as being available in the docket, find the docket as described in the previous paragraph, and then select “Supporting & Related Material” in the Document Type column. Public comments will also be placed in our online docket and can be viewed by following the instructions on the Frequently Asked Questions webpage, available at www.regulations.gov/faq. That page also explains how to subscribe for email alerts that will notify you when comments are posted or if a final rule is published.

Personal information. We accept anonymous comments. Comments we post to www.regulations.gov will include any personal information you have provided. For more information about privacy and submissions to the docket in response to this document, see DHS’s eRulemaking System of Records notice (85 FR 14226, March 11, 2020).

II. Abbreviations

2013 final rule	Implementation of the Amendments to the International Convention on Standards of Training, Certification and
-----------------	--

	Watchkeeping for Seafarers, 1978, and Changes to National Endorsements final rule
BLS	Bureau of Labor Statistics
BRM	Bridge resource management
BTS	Bureau of Transportation Statistics
CFR	Code of Federal Regulations
CSM	Computer Systems and Maintenance
DDE	Designated Duty Engineer
DHS	Department of Homeland Security
DOT	Department of Transportation
ECDIS	Electronic Chart Display and Information System
ECI	Employment Cost Index
ETR	Electro-technical Rating
ETSO	Engineering Terminology and Shipboard Operations
<i>FR</i>	<i>Federal Register</i>
GDP	Gross Domestic Product
GS	General Schedule
GSA	General Services Administration
GT	Gross Tonnage
HVPS	High Voltage Power Systems
HP	Horsepower
IMO	International Maritime Organization
kW	Kilowatt
LMS	Leadership and managerial skills
LTW	Leadership and teamworking
M&IE	Meals and incidental expense rates
MMC	Merchant Mariner Credential
MMLD	Merchant Mariner Licensing Documentation
MPH	Miles per hour
NMC	National Maritime Center
NPRM	Notice of Proposed Rulemaking
OMB	Office of Management and Budget
OICEW	Officer in Charge of an Engineering Watch
OICNW	Officer in Charge of a Navigational Watch
QA	Qualified Assessor
RA	Regulatory analysis
RFA	Regulatory Flexibility Act
§	Section
SOC Code	Standard Occupational Classification Code
STCW Code	Seafarer's Training Certification and Watchkeeping Code
STCW Convention	International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as Amended
SME	Subject Matter Expert
U.S.C.	United States Code

III. Executive Summary

A. Purpose

The purpose of the proposed rule is to remove six requirements related to Merchant Mariner Credential (MMC) endorsements for the International Convention on

Standards of Training, Certification, and Watchkeeping for Seafarers, 1978, as Amended (STCW Convention) and the Seafarer's Training, Certification, and Watchkeeping Code (STCW Code). Changes would affect Masters and Officers in Charge of a Navigational Watch (OICNW) of vessels less than 500 Gross Tonnage (GT) in near-coastal waters; Officers in Charge of an Engineering Watch (OICEW), Designated Duty Engineers (DDE), and Electro-technical Ratings (ETRs) on vessels with propulsion machinery of 750 Kilowatt (kW)/1,000 Horsepower (HP) or more. The proposal would also remove a duplicate provision and transitional provisions that expired on January 1, 2017. This proposed action would reduce regulatory burdens and promote equivalent compliance standards with international requirements.

B. Legal Authority

The legal basis of this proposed rule is 46 U.S.C. 2103, which grants the Secretary of the Department of Homeland Security (DHS) the authority to issue regulations to carry out the provisions of 46 U.S.C. Subtitle II, Vessels and Seamen. More specifically, 46 U.S.C. 7101 authorizes the Secretary of DHS to prescribe the requirements of licensed individuals, and 46 U.S.C. 7301 and 7313 establish the requirements for rating endorsements in the engine department. The Secretary of DHS has delegated these statutory authorities to the Coast Guard through DHS Delegation No. 00170.1(II)(92)(e) and (f), which authorizes the Coast Guard to determine and establish the experience and professional qualifications required for the issuance of credentials.

C. Summary of Major Provisions

The Coast Guard proposes to remove the following six requirements related to STCW endorsements in 46 CFR parts 11 and 12.

- Leadership and managerial skills (LMS) training to qualify as a Master of vessels of less than 500 GT limited to near-coastal waters or to renew that endorsement (46 CFR 11.317(a)(3)(v) and (b)(1)).

- Bridge resource management (BRM) training to qualify as an OICNW on vessels of less than 500 GT limited to near-coastal waters (46 CFR 11.321(a)(3)(iv)).
- Demonstration of meeting the standard of competence¹ in leadership and teamworking (LTW) skills to qualify as OICNW on vessels of less than 500 GT limited to near-coastal waters or to renew that endorsement (46 CFR 11.321(b)(1)).
- Engineering Terminology and Shipboard Operations (ETSO) training to qualify as OICEW in a manned engineroom or DDE in a periodically unmanned engineroom on vessels powered by main propulsion machinery of 750 kW/1,000 HP propulsion power or more (46 CFR 11.329(a)(4)(v)).
- Computer Systems and Maintenance (CSM) training to qualify as an ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more (46 CFR 12.611(a)(4)(i)).
- High Voltage Power Systems (HVPS) training to qualify as an ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more (46 CFR 12.611(a)(4)(ii)).

The Coast Guard is also proposing some technical revisions to § 11.317 to remove duplicative or outdated language. Specifically, we propose to correct an administrative error in which the Radar Observer requirement was inadvertently listed twice in 46 CFR 11.317(a)(3) to remove language that references the one-time renewal of the endorsement after January 1, 2017, from § 11.317(b).

¹ “Standard of competence” is defined in 46 CFR 10.107(b) as the level of proficiency to be achieved for the proper performance of duties onboard vessels according to the national and international criteria. Title 46 CFR 11.301 describes the accepted methods mariners may utilize for meeting the standard of competence required by the STCW Code. For LTW skills, the standard may be demonstrated through the successful completion of assessments, approved or accepted by the Coast Guard, and signed by a qualified assessor (QA) through completion of a Coast Guard approved or accepted training course.

The Coast Guard identified these six requirements for removal as part of the review-and-repeal effort required by Executive Order 14219 (Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative (90 FR 10583, Feb. 25, 2025)) and Executive Order 14192 (Unleashing Prosperity Through Deregulation (90 FR 9065, Feb. 06, 2025)). In accordance with these Executive orders, the Coast Guard re-evaluated the necessity of LMS, BRM, ETSO, CSM, and HVPS training for specific endorsements and the requirement to meet the standard of competence in LTW skills.

For the LMS and BRM training requirements, and the requirement to meet the standard of competence in LTW skills, we have determined that these training requirements exceed the requirements of the STCW Convention and STCW Code for an officer operating at the operational level on vessels less than 500 GT limited to near-coastal waters and do not improve safety on board because these vessels have a limited number of personnel on the bridge. Generally, these vessels have only one credentialed mariner serving as a watchstander, and this deck officer fulfills the role of OICNW as well as helmsman and lookout. Considering that the bridge team consists of one person, the LMS and BRM training requirements and meeting the standard of competence in LTW skills are unnecessary for safe shipboard operations. In addition, these requirements go beyond the skillset necessary for deck officers on vessels of less than 500 GT limited to near-coastal waters. The need for LMS and BRM training and meeting the standard of competence in LTW skills remains valid for deck officers credentialed for service on larger vessels (500 GT or more), or on ocean routes, who lead bridge watch teams consisting of multiple personnel.

Regarding the ETSO training requirement to qualify for an STCW endorsement as OICEW in a manned engine room or as DDE in a periodically unmanned engine room, we have determined that this training requirement exceeds the requirement of the STCW

Convention and STCW Code for an officer operating at the operational level on vessels with propulsion power of 750 kW/1,000 HP or more. Engineering officers are expected to have acquired this foundational knowledge through their broader engineering training and experience, and their competency in these subjects is further assessed through examination and onboard service. Therefore, requiring a separate approved course is unnecessary and imposes an undue burden on mariners without corresponding safety benefits.

With regard to the requirement for CSM training to qualify for an STCW endorsement as ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more, an ETR would not be authorized to work on computer equipment without being under the direct supervision of a credentialed officer who would be responsible for directing the appropriate computer work to be completed and would be the primary person completing the work with an ETR supporting them. Therefore, in addition to exceeding the requirements of the STCW Convention and STCW Code, we have determined this training requirement goes beyond the skillset necessary and the level of responsibility associated with an ETR endorsement and thus is unnecessary and overly burdensome.

Similarly, with regard to the requirement for HVPS training to qualify for an STCW endorsement as ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more, an ETR would not be authorized to work on HVPS without being under the direct supervision of a credentialed officer who would be responsible for directing the appropriate HVPS to be completed and would be the primary person completing the work with an ETR supporting them. Therefore, in addition to exceeding the requirements of the STCW Convention and STCW Code, we have determined this training requirement goes beyond the skillset necessary and the level of responsibility associated with an ETR endorsement and thus is unnecessary and overly burdensome.

D. Cost-Savings

As a deregulatory action, this proposed rule would not impose any new costs on mariners or the Federal Government. The removal of LMS training, BRM training, ETSO training, CSM training, HVPS training, and the requirement to meet the standard of competence in LTW skills would reduce the burden on affected mariners, as they would no longer need to complete these trainings or provide evidence of meeting the standard of competence in LTW skills to obtain or retain their respective STCW endorsements.

The benefits of this proposed rule would be realized as cost savings for mariners and the Federal Government. Removing the LMS training requirement would lead to an annualized cost savings for deck officers of \$991,977; removing the BRM training requirement would lead to an annualized cost savings for mariners of \$98,545; and removing the ETSO training requirement would lead to an annualized cost savings for mariners of \$4,920,634. These cost savings would include tuition, the opportunity cost of time spent attending training, the travel costs associated with training, and the opportunity cost associated with compiling the documentation required as part of an application for an MMC. With regards to the removal of CSM and HVPS training, 46 CFR part 15 currently has no vessel manning² requirement for an ETR on any vessel. Because there are no manning requirements for ETR, it is not possible to determine or estimate the population of mariners who would be taking CSM and HVPS training to meet the requirements for this endorsement, and we did not estimate costs and subsequent cost savings associated with this regulatory provision.

Removing the requirement to meet the standard of competence in LTW skills and the opportunity cost associated with compiling documentation required as part of an

² “The manning of a vessel” is the complement of officers and ratings considered by the Coast Guard to be necessary for safe operation, as described in 46 U.S.C. 8101(a).

MMC application would lead to an annualized cost savings for mariners of \$83,094. The removal of the LMS, BRM, and ETSO training requirements, and the removal of the requirement to meet the standard of competence in LTW skills, would lead to an annualized cost savings for the Federal Government of \$1,947, since evaluating training certificates and evidence of completed assessments of competence as part of an MMC application would no longer be necessary.

We estimate the total cost savings of the proposed rule to mariners and the Federal Government to be approximately \$42,817,136 (\$6,967,231 for removing LMS training requirements + \$692,139 for removing BRM training requirements + \$583,617 for removing demonstration of the standard of competence in LTW skills requirement + \$34,560,474 for removing ETSO training requirements + \$13,675 for removing Federal Government costs) over a 10-year period of analysis (discounted at 7 percent).

Furthermore, we estimate the annualized total cost savings to be approximately \$6,096,197 (\$991,977 for LMS + \$98,545 for BRM + \$83,094 for LTW skills + \$4,920,634 for ETSO + \$1,947 for removing Federal Government costs) discounted at 7 percent. Using a perpetual period of analysis, we estimate the total annualized cost savings of this proposed rule to be \$3,833,921 in 2024 dollars, using a 7 percent discounted rate.

We estimate that an average of 825 mariners (172 masters for LMS, 25 mariners for BRM, 168 mariners for LTW skills, and 460 mariners for ETSO) would benefit each year from this proposed rule. The cost savings for mariners would come from avoided expenses, as neither group would need to complete the LMS, BRM, or ETSO training, nor demonstrate meeting the standard of competence in LTW skills required for their respective STCW endorsements. While the rule also removes the CSM and HVPS training requirements for ETRs, no associated cost savings can be estimated because there are currently no vessel manning requirements for ETRs, which makes it impossible

to determine the population of mariners who would be affected by this change. In

Section VI., Regulatory Analyses, in this preamble, we present the cost savings analysis associated with this proposed rule.

IV. Background

The Coast Guard established a program for the training and certification of personnel serving on U.S. vessels that is governed by domestic law in 46 U.S.C. and in 46 CFR parts 11 and 12. Through these domestic statutes and regulations, the United States implements the provisions of the STCW Convention and the STCW Code.

The International Maritime Organization (IMO) establishes the minimum training and certification requirements for seafarers and maritime personnel through the STCW Convention and STCW Code. In 2007, the IMO began a comprehensive review of the STCW Convention and STCW Code that resulted in the 2010 STCW amendments. These amendments were implemented by the Coast Guard through the 2013 final rule titled, “Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Changes to National Endorsements” (78 FR 77796, Dec. 24, 2013) (hereafter “the 2013 final rule”). This rule included the requirements for—

(1) LMS training to qualify as Master of vessels of less than 500 GT limited to near-coastal waters or to renew that endorsement after January 1, 2017;

(2) BRM training to qualify as OICNW on vessels of less than 500 GT limited to near-coastal waters;

(3) Demonstration of meeting the standard of competence in LTW skills to qualify as OICNW on vessels of less than 500 GT limited to near-coastal waters or to renew that endorsement after January 1, 2017;

(4) ETSO training to qualify as OICEW in a manned engineroom or a DDE in a periodically unmanned engineroom on vessels powered by main propulsion machinery of 750 kW/1,000 HP propulsion power or more;

(5) CSM training to qualify as an ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more; and

(6) HVPS training to qualify as an ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more.

Although not required by domestic statute or the minimum international standards contained in the STCW Convention or the STCW Code for these endorsements, the Coast Guard included these requirements in the 2013 final rule as a means to ensure safe vessel operations. After further review and for the reasons discussed below, the Coast Guard has determined that these six requirements are unnecessary for the safe operation of applicable vessels.

V. Discussion of Proposed Rule

With this rulemaking, the Coast Guard is promoting the goals of Executive Orders 14219 and 14192 by determining that LMS, BRM, ETSO, CSM, and HVPS training requirements, and the requirement to meet the standard of competence in LTW skills, are unnecessary for the endorsements identified in this proposal. In conducting a retrospective review of 46 CFR parts 11 and 12, we have determined these requirements should be removed to reduce the regulatory burden on mariners. These proposed changes would also reduce the financial burden on mariners and the Federal Government by removing overly burdensome regulatory requirements.

We provide a section-by-section description of our proposed changes in the following paragraphs.

46 CFR Part 11 – Authority

The Coast Guard is revising the authority citation to remove “14 U.S.C. 503.” Section 503 provides general administrative authority concerning the establishment and administration of the Coast Guard. Because 46 U.S.C. chapters 21, 71, 75, 77, and 89 provide the specific statutory authorities for the regulations in this part, citation to 14 U.S.C. 503 is unnecessary.

The Coast Guard is also proposing to remove “46 U.S.C. §§ 8903, 8904, and 8906” and replacing it with “46 U.S.C. chapter 89.” Part 11 governs the credentialing of mariners serving on vessels subject to multiple provisions within chapter 89, including freight vessels, small passenger vessels, and vessels subject to statutory exceptions. The existing authority citation references only selected sections of chapter 89 and does not fully reflect the scope of statutory provisions underlying the regulations.

Section 11.317—Requirements to qualify for an STCW endorsement as Master of vessels of less than 500 GT limited to near-coastal waters (management level)

The Coast Guard proposes to remove the requirement in § 11.317(a)(3)(v) to provide evidence of having satisfactorily completed LMS training to qualify for an STCW endorsement as Master of vessels of less than 500 GT limited to near-coastal waters. The purpose of LMS training is to improve the control of ship operations through the effective management of resources and handling of personnel. We propose removing the LMS training requirement for Master of vessels less than 500 GT limited to near-coastal waters because these vessels typically operate with a single credentialed mariner who fulfills multiple roles, making team-based training unnecessary; and LMS training is not required by domestic statute or the minimum international standards in the STCW Convention or the STCW Code for these particular mariners.

Additionally, the Coast Guard proposes to correct a typographical error in which § 11.317(a)(3)(iv) and (a)(3)(vii) both require “Radar Observer, if serving on a vessel with this equipment.” The language currently at (a)(3)(iv) would be deleted, while the

second instance of the requirement currently at (a)(3)(vii) would be redesignated as (a)(3)(v).

These proposed changes include redesignating § 11.317(a)(3)(iv) through (a)(3)(viii) as § 11.317(a)(3)(iv) through (a)(3)(vi), respectively.

We also propose making several changes to existing § 11.317(b). We are proposing to remove language that references renewal of the endorsement after January 1, 2017, which was a one-time requirement implemented to ensure mariners with existing STCW endorsements meet the same standards as new mariners. We propose this change because the January 1, 2017, deadline has passed and is, therefore, no longer relevant. We also propose removing § 11.317(b)(1), which requires evidence of having successfully completed LMS training to be eligible for a renewal of an STCW endorsement as Master of vessels of less than 500 GT limited to near-coastal waters. If a mariner held an STCW endorsement and has not renewed it since January 1, 2017, they would not need to complete LMS training to reinstate the endorsement, if a final rule is published.

Additionally, as previously discussed, LMS training focuses on improving communication between shipboard officers and crew. Due to the limited manning on this size of vessel, we do not believe that this training is necessary for safe shipboard operations. LMS training is also not required by domestic statute or the minimum international standards in the STCW Convention or the STCW Code for these endorsements.

Finally, we would revise existing § 11.317(b) to incorporate existing § 11.317(b)(2), since we are proposing to remove § 11.317(b)(1). Existing § 11.317(b)(2) requires that each candidate seeking to renew their STCW endorsement as Master of vessels of less than 500 GT limited to near-coastal waters must provide evidence of successful completion of an approved training in Electronic Chart Display and

Information System (ECDIS), if serving on a vessel with this equipment. The training requirement for ECDIS (if serving on a vessel with the equipment) would not change.

Section 11.321—Requirements to qualify for an STCW endorsement as Officer in Charge of a Navigational Watch (OICNW) of vessels of less than 500 GT limited to near-coastal waters (operational level)

We propose to remove the requirement in § 11.321(a)(3)(iv) to provide evidence of having satisfactorily completed BRM training to qualify for an STCW endorsement as an OICNW of vessels less than 500 GT limited to near-coastal waters. The purpose of BRM training is to improve the interaction between watchstanders to ensure that they properly utilize data outputs from shipboard equipment and other personnel while conducting watchstanding duties. We propose removing the BRM training for OICNW of vessels of less than 500 GT limited to near-coastal waters, as these vessels generally only have one credentialed mariner serving as a watchstander, and this deck officer fulfills the role of OICNW as well as helmsman and lookout. Therefore, BRM training is not necessary for safe shipboard operations and is not required by domestic statute or the minimum international standards in the STCW Convention or the STCW Code for these endorsements. We also propose to redesignate § 11.321(a)(3)(v) through (a)(3)(vii) as § 11.321(a)(3)(iv) through (a)(3)(vi), respectively.

Additionally, we propose to remove the requirement in existing § 11.321(b)(1) to demonstrate meeting the standard of competence in LTW skills to be eligible for renewal of an STCW endorsement as OICNW of vessels less than 500 GT limited to near-coastal waters, and from § 11.321(b) the transitional provision specifying this after January 1, 2017. As previously discussed, the purpose of LTW skills training is to improve the ability of a watchstander to effectively lead other personnel while conducting watchstanding duties. Due to the limited manning on this size of vessel, we do not believe that this training is necessary for safe shipboard operations. We propose the

removal of January 1, 2017, from § 11.321(b) because the January 1, 2017, deadline has passed and is no longer relevant.

We would also revise existing § 11.321(b) to incorporate existing paragraph (b)(2). Existing § 11.321(b)(2) requires that each candidate seeking to renew their STCW endorsement as Master of vessels of less than 500 GT limited to near-coastal waters must provide evidence of successful completion of an approved training in ECDIS, if serving on a vessel with this equipment. The training requirement for ECDIS (if serving on a vessel with the equipment) would not change

Section 11.329—Requirements to qualify for an STCW endorsement as OICEW in a manned engineeroom or DDE in a periodically unmanned engineeroom on vessels powered by main propulsion machinery of 750 kW/1,000 HP propulsion power or more (operational level)

We propose to remove the requirement in § 11.329(a)(4)(v) to provide evidence of having satisfactory completion of ETSO training to qualify for an STCW endorsement as OICEW or as DDE at the operational level. This training was originally intended to ensure mariners possess a foundational understanding of engineering terms and routine shipboard engineering functions. However, mariners qualifying for an STCW endorsement as OICEW in a manned engineeroom or DDE in a periodically unmanned engineeroom on vessels powered by main propulsion machinery of 750 kW/1,000 HP propulsion power or more, already have at least 1,080 days of engine service in the engineeroom. Such sufficient shipboard experience, along with completion of practical assessments and written examinations, make the course redundant, not necessary to ensure the safety of operations, and imposes an undue training burden on mariners. Additionally, this training is not required by domestic statute or by the minimum international standards contained in the STCW Convention or the STCW Code for officers serving at the operational level. We also propose to redesignate § 11.329(a)(4)(vi) through (a)(4)(xi) as § 11.329(a)(4)(v) through (a)(4)(x), respectively.

Section 12.611—Requirements to qualify for an STCW endorsement as Electro-technical Rating on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more

The Coast Guard is also proposing to revise § 12.611(a) as follows. We would remove § 12.611(4), including § 12.611(a)(4)(i), requiring the completion of CSM training, § 12.611(a)(4)(ii), requiring the completion of an approved course in high-voltage power systems to qualify for an STCW endorsement as an ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more. The purpose of CSM training is to provide knowledge of computer equipment for the purpose of performing equipment maintenance; however, an ETR is not authorized to work on computer equipment without being under the direct supervision of a credentialed officer. The officer would be responsible for making determinations about the appropriate computer work to be completed and would be the primary person completing the work with an ETR supporting them. Similarly, the purpose of training in HVPS training is to provide knowledge of the systems; an ETR is not authorized to work on HVPS without being under the direct supervision of a credentialed officer. The officer would be the primary person completing the work with an ETR supporting them. Therefore, these training requirements go beyond the skillset necessary, and the level of responsibility associated with an ETR endorsement; thus, the training is unnecessary and overly burdensome.

For these same reasons, the Coast Guard would make a conforming edit to § 12.611(b) to remove the text referencing § 12.611(a)(4).

VI. Regulatory Analyses

We developed this proposed rule after considering numerous statutes and Executive orders related to rulemaking. A summary of our analyses based on these statutes or Executive orders follows.

A. Regulatory Planning and Review

Executive Orders 12866 (Regulatory Planning and Review) and 13563 (Improving Regulation and Regulatory Review) direct agencies to assess the costs and benefits of available regulatory alternatives and, if regulation is necessary, to select regulatory approaches that maximize net benefits. Executive Order 13563 emphasizes the importance of quantifying both costs and benefits, of reducing costs, of harmonizing rules, and of promoting flexibility. Executive Order 13610 also promotes the goals of Executive Order 13563 as it aims to modernize the regulatory systems and to reduce unjustified regulatory burdens and costs on the public. Executive Order 14192 (Unleashing Prosperity Through Deregulation) directs agencies to significantly reduce the private expenditures required to comply with Federal regulations and provides that “any new incremental costs associated with new regulations shall, to the extent permitted by law, be offset by the elimination of existing costs associated with at least 10 prior regulations.”

The Office of Management and Budget (OMB) has not designated this proposed rule as a significant regulatory action under section 3(f) of Executive Order 12866. Accordingly, OMB has not reviewed it.

This proposed rule, if finalized as proposed, is expected to be an Executive Order 14192 deregulatory action.

A regulatory analysis (RA) follows. We use the most recent data available. In many instances, we present values in year 2025 dollars. However, to meet the requirements of Executive Order 14192, when estimating the annualized net cost savings using perpetual discounting, we deflate year 2025 dollars to year 2024 dollars.

The Coast Guard proposes to remove six requirements from its regulations related to the STCW Convention and STCW Code endorsements: LMS, BRM, ETSO, CSM, and HVPS training for specific endorsements, and the requirement to meet the standard of

competence in LTW skills.³

We assume that the cost of attending the required training (such as tuition, travel, lodging, meals and opportunity cost of time) and obtaining an MMC (such as attaching the appropriate documentation) falls on the individual obtaining the credential, making the training requirement economically burdensome to individuals. We acknowledge that in some circumstances companies offer tuition subsidies as an incentive to mariners, and therefore, some of the cost savings would be shared between mariners and employers of mariners. However, we have no data on the amount or frequency of these subsidies and cannot estimate a division of cost savings between the parties, but we believe the subsidies are rare. Therefore, when we refer to the costs to “mariners,” we are referring to “mariners and employers of mariners” who bear the cost of these trainings. We request comments from the public regarding the extent to which private sector employers incur costs from these training requirements.

Using historical data on STCW endorsements issued from 2022 to 2024 from the Coast Guard’s Merchant Mariner Licensing Documentation (MMLD) database,⁴ we estimate that an average of 825 mariners⁵ would benefit each year from this proposed rule.⁶ The reason we used data from the 2022-2024 timeframe here, as well as in many other parts of this Regulatory Analysis, is to avoid the distortions in the data caused by the COVID crisis that immediately preceded these years. The cost savings to those mariners would be avoided costs because they would not be required to complete the LMS, BRM, ETSO, CSM, or HVPS training, or be required to meet the standard of competence in LTW skills to qualify for their respective STCW endorsements. The cost

³ See Section IV., Background, of this preamble for a discussion of these changes.

⁴ The MMLD is utilized to issue MMCs.

⁵ 172 deck officers for LMS, 25 mariners for BRM, 168 mariners for LTW (84 mariners taking the assessment and 84 mariners evaluating them), and 460 mariners for ETSO.

⁶ The Coast Guard is not able to assess the affected population due to lack of substantive data to determine how many mariners would be taking an approved CSM to meet the requirements for an ETR endorsement.

savings to mariners includes avoided costs for tuition, travel and related expenses; and the opportunity cost of time to attend training or complete assessments and attach proof of training or assessment to an application for an MMC. Currently, 46 CFR part 15 has no manning requirement for the ETR on any vessel, and, therefore, no substantive data on the population is available, and the Coast Guard cannot estimate cost savings for the CSM or HVPS training in this analysis. However, if data becomes available prior to the publication of the final rule, the Coast Guard will revise the regulatory analysis appropriately. We request comments from the public about the ETR population.

Training providers that offer these trainings may lose revenue from these courses due to reduced demand. However, as shown in **B. Small Entities**, we believe that this revenue loss will be minimal.

Table 1 provides a summary of the affected population and the cost savings components of this proposed rule. The Coast Guard estimates the total 10-year cost savings of this proposed rule to be about \$42,817,136 (\$6,967,231 for removing LMS training requirements + \$692,139 for removing BRM training requirements + \$583,617 for removing the requirement to meet the standard of competence in LTW skills + \$34,560,474 for removing ETSO training requirements + \$13,675 for reducing administrative costs for the Federal Government), discounted at 7 percent. Furthermore, we estimate the annualized total cost savings to be about \$6,096,197 (\$991,977 for LMS + \$98,545 for BRM + \$83,094 for LTW skills + \$4,920,634 for ETSO + \$1,947 for reducing administrative costs of verifying training and assessments for the Federal Government), discounted at 7 percent. Using a perpetual period of analysis, we estimate the total annualized cost savings of this proposed rule to be \$3,833,921 million in 2024 dollars, using a 7 percent discounted rate.

Table 1: Proposed CFR Changes and Estimated Cost Savings of the Proposed Rule

Change	Description	Affected Population	Costs	Cost Savings
Eliminate 46 CFR 11.317(a)(3)(iv)	Remove the duplicate language requiring “Radar Observer, if serving on a vessel with this equipment.” The duplicate requirement, currently at (a)(3)(vii) will remain and will be redesignated as (a)(3)(v).	-	No cost to mariners or the Federal Government.	No impact; editorial.
Eliminate 46 CFR 11.317(a)(3)(v) & 11.317(b)(1)	Remove LMS training requirements for deck officers seeking an original or renewal STCW endorsement as Master of vessels of less than 500 GT limited to near-coastal waters.	515 total deck officers, based on a 3-year data period ⁷ , would no longer be required to take LMS training. Annual average of 172 deck officers would benefit from the proposed rule. ⁸	No cost to deck officers or the Federal Government.	\$991,977 annualized and \$6,967,231 for 10-year cost savings for deck officers (7% discount rate). \$452annualized and \$3,175 for 10-year cost savings for the Federal Government (7% discount rate).
Eliminate 46 CFR 11.321(a)(3)(iv)	Remove BRM training requirement for mariners seeking an original STCW endorsement as OICNW of vessels of less than 500 GT limited to near-coastal waters.	74 total mariners, based on a 3-year data period, would no longer be required to take BRM training. Annual average of 25 mariners would benefit from the proposed rule. ⁹	No cost to mariners or the Federal Government.	\$98,545 annualized and \$692,139 for 10-year cost savings for mariners (cost savings) (7% discount rate). \$66annualized and \$464 for 10-year cost savings for the Federal Government (7% discount rate).

⁷ The average is based on the three years 2022, 2023, and 2024.

⁸ The Coast Guard has 3 years of Merchant Mariner Licensing Documentation (MMLD) data from 2022 to 2024; (515 divided by 3 equals 171.66), 172 (rounded). We obtained the population of Masters who operate vessels of less than 500 GT limited to near-coastal waters from the National Maritime Center (NMC).

⁹ The Coast Guard has 3 years of MMLD data from 2022 to 2024; (74 divided by 3 equals 24.67), 25 (rounded). We obtained the population of OINCWs, who operate vessels of less than 500 GT limited to near-coastal waters from the NMC.

Eliminate 46 CFR 11.321(b)(1)	Remove the requirement to meet the standard of competence in LTW skills for mariners seeking an original or renewal STCW endorsement as OICNW of vessels of less than 500 GT limited to near-coastal waters.	251 mariners based on a 3-year data period would no longer be required to meet the standard of competence in LTW skills. This would also reduce the burden on the Qualified Assessors (QAs) who currently assess these mariners. Annual average of 84 mariners would benefit from proposed rule. ¹⁰	No cost to mariners or the Federal Government.	\$83,094 annualized and \$583,617 for 10-year cost savings for mariners (cost savings) (7% discount rate). \$1,208 annualized and \$8,484 for 10-year cost savings for the Federal Government (7% discount rate).
Eliminate 46 CFR 11.329(a)(4)(v)	Remove the ETSO training requirement for mariners seeking an original STCW endorsement as OICEW in a manned engine room on vessels powered by main propulsion machinery of 750 kW/1,000 HP propulsion power or more	1,379 mariners based on a 3-year data period would no longer be required to take ETSO training. Annual average of 460 mariners would benefit from the proposed rule. ¹¹	No cost to mariners or the Federal Government.	\$4,920,634 annualized and \$34,560,474 for 10-year cost savings for mariners (cost savings) (7% discount rate). \$221 annualized and \$1,552 for 10-year cost savings for the Federal Government (7% discount rate).
Eliminate 46 CFR § 12.611(a)(4)	Remove training requirements for mariners seeking an original STCW endorsement as ETR on vessels powered by main propulsion machinery of 750kW/1,000 HP or more.	The Coast Guard is not able to assess the affected population due to lack of substantive data to determine how many mariners would be taking approved CSM or HVPS training to meet the requirements for an ETR endorsement.	No cost to mariners or the Federal Government.	Not able to assess cost savings or burden hour reduction because currently there are no vessel manning requirements for an ETR endorsement.

¹⁰ The Coast Guard has 3 years of MMLD data from 2022 to 2024; (251 divided by 3 equals 83.67), 84 (rounded). We obtained the population of OINCWs, who operate vessels of less than 500 GT limited to near-coastal waters from the NMC. We then estimated that for every such OICNW, there is one Qualified Assessor (QA) who evaluated them.

¹¹ The Coast Guard has 3 years of MMLD data from 2022 to 2024; (1,379 divided by 3 equals 459.67), 460 (rounded). We obtained the population of OINEWs in a manned engine room, on vessels powered by main propulsion machinery of 750 kW/1,000 HP propulsion power or more from the NMC.

Affected Population

This proposed rule would affect mariners seeking the following training or assessment to qualify for STCW endorsements:

- LMS training to be endorsed as Master of vessels of less than 500 GT limited to near-coastal waters;
- BRM training to be endorsed as OICNW on vessels of less than 500 GT limited to near-coastal waters;
- LTW skills assessment to be endorsed as OICNW on vessels of less than 500 GT limited to near-coastal waters;
- ETSO training to be endorsed as OICEW in a manned engineroom on vessels powered by main propulsion machinery of 750 kW/1,000 HP propulsion power or more; and
- CSM training to be endorsed as ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more; and
- HVPS training to be endorsed as ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more.

Per **Section IV., Background**, and table 1 of this proposed rule, there are no vessel manning requirements for ETRs and there was no available data when we performed this analysis to forecast the number of mariners who may seek ETR endorsements. Therefore, we cannot estimate cost savings or the burden-hour reduction for the CSM or HVPS training. However, if data becomes available prior to the publication of the final rule, the Coast Guard will revise the regulatory analysis appropriately. We request comments from the public about the ETR population.

The MMLD database is utilized to issue MMCs at the National Maritime Center (NMC). Table 2 presents the STCW endorsement data used to calculate the affected

population of mariners who would be required to complete LMS, BRM, and ETSO training and to meet the standard of competence in LTW skills in the absence of this rule. The data presented in the table comes from MMLD.

Table 2: Estimated Annual Number of Mariners Applying for STCW Endorsements that Require LMS, BRM and ETSO Training

Year	Master of vessels of less than 500 GT limited to near-coastal waters, original endorsement (currently required to take LMS training)	OICNW of vessels of less than 500 GT limited to near-coastal waters, original endorsement (currently required to take BRM training)	OICNW of vessels of less than 500 GT limited to near-coastal waters, renewal endorsement (currently required to meet the standard of competence in LTW skills)	OICEW in a manned engineroom, original endorsement (currently required to take ETSO training)	Total
2022	293	34	82	456	865
2023	151	17	64	462	694
2024	71	23	105	461	660
Total	515	74	251	1,379	2,219
Average	172	25	84	460	741

To estimate the population of mariners who currently need to take LMS training and would be affected by this proposed rule, we estimate the number of Masters of vessels of less than 500 GT limited to near-coastal waters to whom the NMC issued an original (not renewal) endorsement each year.¹² We added together historical populations from calendar year 2022 to calendar year 2024 to obtain the aggregate number for these years, 515, and then divided this number by the total number of years of available credentialing data, or 3 years, to obtain the average size of the affected population per year, or about 172¹³ ($515 \div 3$). This is reflected in the column of table 2 titled “Master of vessels of less than 500 GT limited to near-coastal waters, original endorsement (currently required to take LMS training).”

To estimate the population of mariners who currently need to take BRM training and would be affected by this proposed rule, we estimate the number of OICNWs of vessels of less than 500 GT limited to near-coastal waters to whom the NMC issued an original (not renewal) endorsement each year. These mariners currently need to take BRM training but would not need to under the proposed rule. As before, we divide the total number of credentials issued between 2022 and 2024, to obtain the number, 74, by the total number of years of available credentialing data, or 3 years, to obtain the average number of mariners per year, or about 25 ($74 \div 3$).¹⁴ This is reflected in the column of table 2 titled “OICNW of vessels of less than 500 GT limited to near-coastal waters, original endorsement (currently required to take BRM training).”

To estimate the population of mariners who currently need to meet the standard of competence in LTW skills and would be affected by this proposed rule, we estimate the number of OICNW of vessels of less than 500 GT limited to near-coastal waters to whom the NMC issued a renewal endorsement each year. These mariners currently need to

¹² These mariners currently need to take LMS training but would not need to under the proposed rule.

¹³ This number is rounded to the closest whole number.

¹⁴ Rounded to closest whole number.

meet the standard of competency for LTW skills but would not need to be under the proposed rule. As before, we divide the total number of credentials renewed between 2022 and 2024, to obtain the number, 251, by the total number of years of available credentialing data, which is 3 years, to obtain the average number of mariners per year, or about 84 ($251 \div 3$).¹⁵ This is reflected in the column of table 2 titled “OICNW of vessels of less than 500 GT limited to near-coastal waters, renewal endorsement (currently required to meet the standard of competence in LTW skills).”

To estimate the population of mariners who currently need to take ETSO training and would be affected by this proposed rule, we estimate the number of OICEW in a manned engine room to whom the NMC issued an original (not renewal) endorsement each year. These mariners currently need to take ETSO training but would not need to under the proposed rule. As before, we divide the total number of credentials issued between 2022 and 2024, to obtain the number, 1,379, by the total number of years of available credentialing data, which is 3 years, to obtain the average number of mariners per year, or about 460 ($1,379 \div 3$).¹⁶ This is reflected in the column of table 2 titled “OICEW in a manned engine room, original endorsement (currently required to take ETSO training).”

As stated previously, per **Section IV., Background**, and table 1 of this proposed rule, there are no vessel manning requirements for ETRs and there was no available data when we performed this analysis to estimate the number of mariners who may seek ETR endorsements. Therefore, there is no estimate for the affected population of mariners seeking this endorsement; hence, we cannot estimate cost savings or the burden-hour reduction for the CSM or HVPS training. However, if data becomes available prior to

¹⁵ Rounded to closest whole number.

¹⁶ Rounded to closest whole number.

the publication of the final rule, the Coast Guard will revise the regulatory analysis appropriately. We request comments from the public about the ETR population.

Costs

The regulatory changes in this proposed rule would not impose any new or additional costs to mariners or the Federal Government. The Coast Guard estimates that the cost of attending the required training (such as tuition, travel, lodging, meals and opportunity cost of lost income) and obtaining an MMC (such as attaching the appropriate documentation) is borne by the individual obtaining the credential, making the training requirement economically burdensome to individuals. By removing the six requirements for these STCW endorsements, there would be a reduced impact on the mariners and on the Federal Government (in terms of the review process).

Cost Savings

The cost savings to mariners are the costs avoided by not attending the LMS, BRM, ETSO, CSM, and HVPS training or meeting the standard of competence in LTW skills. The cost savings to mariners are the total of the avoided costs for tuition, travel and related expenses, lost time to attend training or to complete assessments, and the time to attach the relevant documentation to an application for an MMC. The cost savings to the Federal Government include the time to verify that the training or skill assessments were completed.

Benefits

The primary monetized benefit of this proposed rule is the cost savings mariners would realize from not having to complete either the LMS, BRM, or ETSO training or having to meet the standard of competence in LTW skills. Non-quantifiable benefits could be realized by mariners who would not have to sacrifice their personal time and money completing training and assessments for certain STCW endorsements.

Baseline

We based our cost estimates used in this RA for LMS, BRM, and ETSO training and LTW skills assessments on information we obtained from the websites of Coast Guard-approved training providers.¹⁷ Costs associated with deck officer wage, travel and lodging are derived from the Bureau of Labor Statistics (BLS), the U.S. Department of Transportation (DOT)-Bureau of Transportation Statistics (BTS), and the General Services Administration (GSA). Additionally, round-trip airport transfer data is derived from a 2006 Coast Guard interim rule, “Validation of Merchant Mariners’ Vital Information and Issuance of Coast Guard Merchant Mariner's Licenses and Certificates of Registry.”¹⁸

To obtain the cost calculations associated with this proposed rule, the Coast Guard estimated the annual costs to mariners to fulfill the six requirements listed in **Section IV., Background**. After establishing the costs to mariners, we calculated the costs saved by not having to fulfill these requirements. To find the annual costs associated with LMS, BRM, and ETSO trainings, we estimated the current costs to mariners including the tuition, the opportunity cost of the time to take the training, the time to travel to the training, the mileage, the lodging costs, when applicable, and the cost of purchasing meals and incidentals. To obtain the annual costs associated with meeting the standard of competence in LTW skills, we estimated the opportunity costs of time associated with mariners completing the assessments required to demonstrate meeting the standards of competence. We also accounted for the time a mariner would spend

¹⁷ We searched the websites of all training providers. For the purpose of this analysis, we included only training courses with information on course tuition and course duration easily accessible online. We used the list of approved course providers as of May 15, 2025. Out of 22 training providers offering Coast Guard-approved LMS training, 15 (68 percent rounded) list both tuition cost and course duration. Out of 11 training providers offering Coast Guard-approved LMS training, 9 (82 percent rounded) list both tuition cost and course duration. Out of 2 training providers offering Coast Guard-approved ETSO training, 1 (50 percent) listed both tuition cost and course duration.

¹⁸ We adjusted for inflation the estimates obtained from this published final rule on January 13, 2006 (71 FR 2154).

preparing the documentation of completing these requirements as part of an MMC application, and in the following sections, we discuss these costs.

To assess the cost savings, the Coast Guard evaluated the components of the current baseline costs for mariners and the Federal Government. These costs are as follows:

- Tuition costs
- Opportunity costs of time
- Opportunity costs of travel time
- Fuel costs
- Meal and lodging costs
- Compiling documentation (for mariners) and verifying relevant documentation (e.g. verifying the training certificate for LMS) (for Coast Guard personnel)

We discuss each of the above-mentioned costs in greater detail below.

Tuition Cost for LMS, BRM, and ETSO Training and Opportunity Cost for Meeting the Standard of Competence in LTW Skills

To estimate the tuition cost, the Coast Guard used data from the NMC, which includes information on 15 training providers offering Coast Guard-approved LMS training, 9 training providers offering Coast Guard-approved BRM training, and 2 training providers offering Coast Guard-approved ETSO training. There are 8 training providers offering both LMS and BRM training and list the course tuition and duration online. The cost of LMS training ranges from \$650 to \$1,925 in terms of 2025 dollars, and the cost of BRM training ranges from \$600 to \$3,765 in 2025 dollars, which can be found in table 3 and table 4, respectively. We then calculated an average tuition cost for both LMS and BRM training from the training provider cost data in these tables to get \$1,118 for LMS training and \$1,287 for BRM training in 2025 dollars.

Table 3: LMS Training: Tuition, Completion Time, and Webpage Information

Course Provider	Tuition (\$2025)	Time (in hours)	Hyperlink
Chesapeake Marine Training Institute	\$950	32	www.chesapeakemarineinst.com/cmti-course/leadership-and-managerial-skills/
Delgado Community College	\$650	35	www.dcc.edu/documents/workforce-development/maritime/2qe2025.pdf
Eat on the Wild Side - Crawford Nautical Training	\$1,000	40	crawfordnautical.org/store/p/leadership
Maine Maritime Academy - Continuing Education	\$1,200	40	mainemaritime.edu/cpmd/courses/stcw-gap-courses/
Mariner Skills, LLC	\$750	35	marinerskills.com/leadership-and-managerial-skills.php
Maritime Institute	\$1,200	35	maritimeinstitute.com/course/leadership-and-managerial-skills/
Maritime Institute of Technology & Graduate Studies	\$1,765	35	www.mitags.org/course/leadership-and-managerial-skills/
Maritime Professional Training	\$1,199	40	www.mptusa.com/course-details/human-element-leadership-management-helm-course-616
Northeast Maritime Institute	\$1,075	40	nmi.edu/leadership-and-managerial-skills/
Quality Maritime Training, LLC	\$1,045	40	qualitymaritimetraining.com/courses/
RCM Maritime, LLC	\$1,049	36	www.rcmmaritime.com/course/leadership-and-managerial-skills/
RelyOn Nutec	\$657	32	shop.relyon.com/Course/CourseDetails?courseTypeId=71570&countryId=12
San Jacinto College Maritime Technology & Training Center	\$1,000	32	www.sanjac.edu/sites/default/files/inline-files/maritime-commercial-class-schedule.pdf
STAR Center	\$1,925	40	www.star-center.com/schedule.html
State University New York Maritime College - Department of Professional Education & Training	\$1,300	35	https://www.sunymaritime.edu/about/visiting-maritime/community-programs/professional-education-training/leadership-and-0
Average	\$1,144	36	

Note: Totals may not sum due to independent rounding (to nearest whole number). All websites last accessed on June 4, 2026. To estimate the completion time in hours for courses that only had the completion time in hours, we used the standard 8-hour business day to reflect the length of a workday. The time (in hours) for the LMS course at Delgado Community College comes from www.dcc.edu/workforce-development/maritime/courses.aspx. The time (in hours) for the LMS course at Eat on the Wild Side - Crawford Nautical Training comes from <https://crawfordnautical.org/credentialing>. The time (in hours) for the LMS course at the

Maritime Institute comes from www.maritimeinstitute.com/wp-content/uploads/2025/04/2025-COURSE-SCHEDULE-4-22-2025_tc.pdf.

Table 4: BRM Training: Tuition, Completion Time, and Webpage Information

Course Provider	Tuition (2025 \$)	Time (in hours)	Hyperlink
Captain School USVI	\$1,300	24	www.captainschoolusvi.com/class-schedule
Chesapeake Marine Training Institute	\$750	32	www.chesapeakemarineinst.com/cmti-course/bridge-resource-management-brm/
Eat on the Wild Side - Crawford Nautical Training	\$600	21	crawfordnautical.org/courses/p/bridge-resource-management
Maritime Institute	\$850	32	maritimeinstitute.com/course/bridge-resource-management/
Maritime Institute of Technology & Graduate Studies	\$3,765	35	www.mitags.org/course/bridge-resource-management-35-hour/
Maritime Professional Training	\$1,999	24	www.mptusa.com/course-details/bridge-resource-management-with-simulator-tasks-course-151S
Northeast Maritime Institute	\$825	24	nmi.edu/bridge-resource-management/
Quality Maritime Training, LLC	\$695	24	qualitymaritimetraining.com/courses/
San Jacinto College Maritime Technology & Training Center	\$800	24	www.sanjac.edu/sites/default/files/inline-files/maritime-commercial-class-schedule.pdf
Average	\$1,287	27	

Note: Totals may not sum due to independent rounding (to the nearest whole number). All websites last accessed on June 4, 2026. To estimate the completion time in hours for courses that only had the completion time in hours, we used the standard 8-hour business day to reflect the length of a workday.

While there is not publicly available information on the tuition cost for the two Coast Guard-approved training providers offering stand-alone ETSO courses (STAR Center and ECO Training Center, LLC), we estimate the tuition cost of an ETSO course based on other courses that include the ETSO training requirements and the duration of the stand-alone ETSO courses.

Four training providers offer courses that include the ETSO training requirements. Table 5 presents the training provider, course name, course duration, and tuition below, as well as the calculated tuition cost per day.

At the STAR Center, the only training provider that both offers a stand-alone ETSO course and has its course duration publicly available, the ETSO course is 9 days.¹⁹ Using the average tuition cost per day calculated in table 5 below and adjusting for inflation using the previously mentioned GDP deflator multiplier, we estimate that tuition for the ETSO course at the STAR Center is \$2,061 (9 days × \$229 average tuition cost per day in 2025 dollars).

¹⁹ www.star-center.com/courses/OICEW.ETSO.pdf (accessed June 4, 2026).

Table 5: Courses that include ETSO training

		Tuition (2025 \$)	Course duration (days)	Average tuition per day (2025 \$)
Course provider	Course name	(a)	(b)	(c) = (a) ÷ (b)
Maritime Institute	Electrical Machinery and Basic Electronics (EMBE) ²⁰	\$4,200	20	\$210
Maritime Professional Training	Auxiliary Machinery (MARTPT-862) ²¹	\$3,199	15	\$213
San Jacinto College Maritime Technology & Training Center	OICEW-Auxiliary Machinery ²²	\$3,500	15	\$233
Training Mariners for Unlimited Engineer License	Electrical Machinery and Basic Electronics (EMBE) ²³	\$3,550	13	\$273
Total		\$14,449	63	
Average				\$229

²⁰ www.maritimeinstitute.com/course/electrical-machinery-and-basic-electronics/ (accessed June 4, 2026).

²¹ www.mptusa.com/course-details/auxiliary-machinery-course-271 (accessed June 4, 2026).

²² noncredit.sanjac.edu/search/publicCourseSearchDetails.do?method=load&courseId=42193&selectedProgramAreaId=19569&selectedProgramStreamId=19629#courseSectionDetails_6302357 (accessed June 4, 2026).

²³ tmfuel.coursestorm.com/course/electrical-machinery-and-basic-electronics11 (accessed June 4, 2026).

The Coast Guard then estimated the cost of time it takes for mariners to meet the standard of competence in LTW skills which is required to qualify for an STCW endorsement as an OICNW of vessels of less than 500 GT limited to near-coastal waters. The requirement to provide evidence of meeting the standard of competence in LTW skills is demonstrated through either the completion of shipboard assessments of competence as witnessed by a QA²⁴ or may be completed as part of Coast Guard-approved training. Based on data provided by the NMC,²⁵ there are 740 QAs approved to conduct LTW skills assessments. These QAs all hold STCW endorsements as deck officers at either management or operational levels. To estimate the time it would take to meet the standard of competence in LTW skills, the NMC provided information on nine training providers that offer Coast Guard-approved LTW training.²⁶ The Coast Guard used this information to determine the average length of time it takes for a mariner to complete the demonstration of competence in LTW skills, which is approximately 9 hours. Table 6 presents this information.²⁷

²⁴ 46 CFR 10.107 defines a “Qualified Assessor or QA” as a person who is qualified to evaluate, for STCW endorsements, whether an applicant has demonstrated the necessary level of competence in the task for which the assessment is being made. This person must be individually approved by the Coast Guard.

²⁵ The data is current as of May 27, 2025.

²⁶ We only consider courses with course duration readily available online, representing at least 60 percent of all courses as explained in the analysis.

²⁷ The Coast Guard did not incorporate the tuition cost of LTW skills training because we estimate all mariners use QAs to witness the demonstration of the standard of competence in LTW skills as it does not require travel and tuition and can be completed at a mariner’s workplace (onboard a vessel).

Table 6: LTW Skills: Completion Time and Webpage Information

Assessment Provider	Time (in hours)	Hyperlink
Chesapeake Marine Training Institute	8	www.chesapeakemarineinst.com/cmti-course/leadership-and-teamworking-skills/
Mariner Skills, LLC	8	marinerskills.com/leadership-and-teamworking-skills
Maritime Institute	8	maritimeinstitute.com/course/leadership-and-teamworking-skills/
Maritime Institute of Technology & Graduate Studies	7	www.mitags.org/course/leadership-and-teamworking-skills/
Maritime Professional Training	8	www.mptusa.com/course-details/leadership-and-teamworking-skills-martpt-768-course-216
Quality Maritime Training, LLC	8	qualitymaritimetraining.com/courses/
San Jacinto College Maritime Technology & Training Center	8	www.sanjac.edu/sites/default/files/inline-files/maritime-commercial-class-schedule.pdf
Seafarers Harry Lundeberg School of Seamanship	14	www.seafarers.org/wp-content/uploads/2018/12/PHCCatalogue.pdf (page 23)
Calhoon MEBA Engineering School	8	www.mebaschool.org/20-curriculum/courses/general-education-courses/105-leadership-teamworking
Average	9	

Note: Totals may not sum due to independent rounding (to the nearest whole number). All websites last accessed on June 4, 2026. To estimate the completion time in hours for courses that only had the completion time in hours, we used the standard 8-hour business day to reflect the length of a workday.

Table 7 presents the tuition cost for mariners taking LMS, BRM and ETSO training. We calculated these costs by multiplying our affected population, provided in Table 2, by the average tuition cost of the LMS, BRM and ETSO training provided in Table 3 and Table 4. We estimate the total undiscounted cost for mariners taking the LMS training to be \$192,296 ($\$1,118 \times 172$ mariners) annually, the total undiscounted cost for BRM training to be \$32,175 ($\$1,287 \times 25$ mariners) annually, and the total cost for mariners taking the ETSO training to be \$948,060 ($\$2,061 \times 460$ mariners) annually.

Table 7: Tuition Costs (Undiscounted) for LMS, BRM, and ETSO Training

	Tuition Cost (2025 dollars)	Number of Mariners	Total Cost
Course	(a)	(b)	(c) = (a) × (b)
LMS	\$1,118	172	\$192,296
BRM	\$1,287	25	\$32,175
ETSO	\$2,061	460	\$948,060

Opportunity Cost of Time

The Coast Guard then estimated the cost of time required for mariners to complete the LMS, BRM and ETSO training and to meet the standard of competence in LTW skills. When analyzing a day of Coast Guard-approved training, we used the standard 8-hour business day to reflect the length of a workday. The duration of LMS training ranges from 32 to 40 hours with an average time being 36 hours as shown in table 3. The duration of BRM training ranges from 21 to 35 hours with an average time of 27 hours as shown in table 4. The duration of the ETSO training is 70 hours.²⁸

²⁸ This course length comes from the ETSO course at the STAR Center (www.star-center.com/courses/OICEW.ETSO.pdf; (accessed June 5, 2026). This is the only school for which we were able to find data. We request public comment on any additional data the public may have.

The Coast Guard obtained wage rate information for mariners from the BLS, specifically the 2025 Occupational Employment and Wage Statistics.²⁹ For deck officers required to complete LMS training we used the mean hourly wage rate for Standard Occupational Classification Code (SOC Code) “Captains, Mates, and Pilots of Water Vessels (53-5021),” for mariners required to complete BRM training and to meet the standard of competence in LTW skills we used SOC Code “Sailors and Marine Oilers (53-5011),” and for mariners required to complete ETSO training, we used SOC Code “Ship Engineers (53-5031).” The BLS reports the mean hourly wage rate for a Captain, Mate, or Pilot to be \$49.87 per hour, which we used to estimate the wage rate of deck officers seeking an STCW endorsement as Master of vessels of less than 500 GT limited to near-coastal waters.³⁰ Similarly, the BLS reports the mean hourly wage rate for a sailor or marine oiler to be \$27.32, which we used for mariners seeking an STCW endorsement as an OICNW on vessels of less than 500 GT limited to near-coastal waters.³¹ Similarly, the BLS reports the mean hourly wage rate for a Ship Engineer to be \$53.75, which we use for mariners seeking an STCW endorsement as an OICEW.³² To account for employee benefits, we used a load factor of 1.42.³³ We then estimated the loaded mean hourly wage rate for a deck officer completing LMS training to be about

²⁹ https://www.bls.gov/oes/2025/may/oes_stru.htm (accessed August 17, 2026).

³⁰ To find the mean hourly wage for a Captain, Mate or Pilot refer to the table in the following link: https://data.bls.gov/oesprofile/?major_group=530000&occupation=535011&measure=01&areas=INDUSTRY,STATE,MSA (accessed August 17, 2026).

³¹ To find the mean hourly wage for a sailor or marine oiler refer to the table in the following link: https://data.bls.gov/oesprofile/?major_group=530000&occupation=535011&measure=01&areas=INDUSTRY,STATE,MSA (accessed August 17, 2026).

³² To find the mean hourly wage for a ship engineer refer to the table in the following link: https://data.bls.gov/oesprofile/?major_group=530000&occupation=535031&measure=01&areas=INDUSTRY,STATE,MSA.

³³ A loaded mean hourly wage rate is what a company pays per hour to employ a person, not the hourly wage an employee receives. The loaded mean hourly wage rate includes the cost of non-wage benefits (health insurance, vacation, etc.). The Coast Guard estimated the load factor by using Table 4 of the BLS news release titled “EMPLOYER COSTS FOR EMPLOYEE COMPENSATION – MARCH 2025” and available at https://www.bls.gov/news.release/archives/ecec_06132025.pdf. The Coast Guard used the “Total compensation” and “Wages and salaries” values for the “Transportation and material moving occupations,” which are \$35.22 and \$23.87, respectively. The Coast Guard divided \$45.38 by \$31.89 and obtained a load factor of 1.42, rounded. The Coast Guard last accessed this BLS’ website on August 17, 2026.

\$70.82 ($\$49.87 \text{ wage rate} \times 1.42 \text{ load factor}$). Similarly, we estimated the loaded mean hourly wage rate for a mariner completing BRM training and meeting the standard of competence in LTW skills to be about \$38.79 ($\$27.32 \text{ wage rate} \times 1.42 \text{ load factor}$). Similarly, we estimated the loaded mean hourly wage rate for a mariner completing ETSO training to be about \$76.33 ($\$53.75 \text{ wage rate} \times 1.42 \text{ load factor}$).

We multiplied the loaded mean hourly wage rate by the number of hours to complete the training to find the current opportunity cost for a deck officer to take the LMS training, which is about \$2,550 ($\$70.82 \text{ wage rate} \times 36 \text{ hours}$). Figures rounded to the nearest dollar. The opportunity cost for a mariner to take the BRM course is about \$1,047 ($\$38.79 \text{ wage rate} \times 27 \text{ hours}$). The opportunity cost for a mariner to take the ETSO course is about \$5,343 ($\$76.33 \text{ wage rate} \times 70 \text{ hours}$).

The Coast Guard estimated the cost of time it takes for mariners to meet the standard of competence in LTW skills necessary to qualify for an STCW endorsement³⁴ as OICNW of vessels of less than 500 GT limited to near-coastal waters. The requirement to provide evidence of meeting the standard of competence in LTW skills is demonstrated through either the completion of shipboard assessments of competence as witnessed by a QA,³⁵ or may be completed as part of Coast Guard-approved training. Based on data provided by the NMC, there are 740 QAs approved to conduct LTW skills assessments. To estimate the time, it would take to demonstrate meeting the standard of competence in LTW skills, the Coast Guard used information on nine Coast Guard approved LTW training courses to determine the average length of time it takes a mariner

³⁴ This requirement is necessary for mariners seeking to qualify or renew the OICNW endorsement after January 2017.

³⁵ 46 CFR 10.107 defines a “Qualified Assessor or QA” means a person who is qualified to evaluate, for STCW endorsements, whether an applicant has demonstrated the necessary level of competence in the task for which the assessment is being made. This person must be individually approved by the Coast Guard.

to complete the demonstration of meeting the standard of competence in LTW skills, which is approximately 9 hours.³⁶

The Coast Guard also accounts for the time of the QA to witness the demonstration of meeting the standard of competence in LTW skills. Because individual mariners bear the financial burden of meeting professional requirements to qualify for an MMC endorsement, and considering the number of QAs is substantially larger than the estimated annual population of OICNWs seeking the endorsement for the first time (740 compared to 84), the Coast Guard estimates mariners seeking this endorsement would utilize a QA to witness the demonstration of LTW skills assessments versus taking approved training to meet this requirement. This is because an assessment with a QA occurs onboard a vessel and so the mariner does not incur any travel costs. The Coast Guard has no additional data concerning the number of mariners who complete the assessments of competence utilizing a QA as opposed to completing approved training. For this reason, we request information and comments from the public and interested stakeholders regarding this assumption.

The population of mariners required to meet the standard of competence in LTW skills is identical to the number of mariners completing BRM training and receiving the STCW endorsement as an OICNW on vessels less than 500 GT limited to near-coastal waters in 46 CFR 11.321. We used the same loaded mean hourly wage rate of \$38.79 for mariners meeting the standard of competence in LTW skills as we did for mariners completing BRM training. For each demonstration of the standard of competence in LTW skills utilizing a QA, there would be two mariners involved: (1) The mariner demonstrating LTW skills assessments; and (2) A QA witnessing the demonstration of LTW skills assessments. Therefore, the opportunity cost of time would be for 168

³⁶ For information on LTW skills training information, refer to table 6 in this preamble.

mariners to complete a demonstration of LTW skills assessments (84 mariners demonstrating LTW skills assessments and 84 QAs witnessing the demonstration of LTW skills assessments). We estimate the opportunity cost of time for a mariner to demonstrate LTW skills assessments to be about \$349 ($\38.79×9 hours) and the opportunity cost of time for a QA to witness the demonstration of LTW skills assessments to be about \$637 ($\70.82×9 hours).^{37 38} Table 8 presents the total opportunity cost of time for all mariners affected by this proposed rule, taking the LMS, BRM, and ETSO training and meeting the standard of competence in LTW skills.

Table 8: Opportunity Cost (Undiscounted) for Affected Mariners to Complete LMS Training, BRM Training, ETSO Training, and Meeting the Standard of Competence in LTW Skills (2025\$)

	Opportunity Cost of Training/Assessment	Number of Mariners	Total Cost
Training / Assessment	(a)	(b)	(c) = (a) × (b)
LMS Training	\$2,550	172	\$438,600
BRM Training	\$1,047	25	\$26,175
ETSO Training	\$5,343	460	\$2,457,780
LTW Skills Assessment Mariners	\$349	84	\$29,316
LTW Skills Assessment QAs	\$637	84	\$53,508

Note: Data for column (a) calculated in preceding paragraph. Data for column (b) comes from the “Average” row in table 2. While table 2 does not explicitly estimate the number of QAs needed to verify that mariners have met the standard of competence for LTW skills, we assume that there is one QA for each mariner needing to demonstrate the standard of competence in LTW skills.

Methodology for Finding Travel Distributions

To estimate the cost of travel and the opportunity cost of travel time, we assume varying modes of travel for mariners getting to and from approved training based on the

³⁷ Qualified Assessors are deck officers; therefore, they would have the same loaded wage rate as SOC Code “Captains, Mates, and Pilots of Water Vessels (53-5021):” \$67.61 per hour.

³⁸ Rounded to closest whole number.

distribution of travel modes, derived in table 16 of CG-MMC Policy Letter 01-21:

Guidelines for Qualifying for STCW Endorsements for Basic and Advanced IGF Code

Operations cost analysis.³⁹ We reflect the same percentages in this NPRM as in the policy

letter by assuming that 20 percent would drive to the training center and return the same

day, 46 percent would drive and lodge, and 34 percent would fly and lodge.⁴⁰ The

percentages used in CG-MMC Policy Letter 01-21 derived from the distance required to

travel to the nearest training provider for each mariner based on the ZIP Code associated

with their credential and the ZIP Codes associated with the training provider locations.

The policy letter utilized a random sample of 100 mariners with STCW endorsements

involving the International Code of Safety for Ships Using Gases or Other Low

Flashpoint Fuels (IGF Code) travelling to training centers offering relevant IGF Code

training courses. In that analysis, we determined that 20 mariners would commute to the

nearest training provider (or live less than 85.4 miles from a training provider), 46 would

drive to the nearest training provider and lodge overnight (or live between 85.4 miles and

583.5 miles from a training provider), and 34 would fly to the nearest training provider

and lodge overnight (or live greater than 583.5 miles from a training provider).

We have determined to use the percentages as they appear in CG-MMC Policy Letter 01-

21. We acknowledge that this creates uncertainty surrounding our cost estimates related

to travel for this specific population of mariners. The Coast Guard requests public

comment on our decision to use these predetermined rates of travel for this cost analysis.

³⁹ <https://www.regulations.gov/document/USCG-2020-0181-0002>. Similar methodology was also used in the Implementation of Training Requirements for Personnel Serving on U.S.-Flagged Passenger Ships That Carry More Than 12 Passengers on International Voyages proposed rule, published on June 21, 2024, (89 FR 52324), available at: <https://www.regulations.gov/document/USCG-2022-0649-0001>.

⁴⁰ *Id.*

We use the same methodology from CG-MMC Policy Letter 01-21 to estimate the thresholds and opportunity costs for travel among the affected population. Using updated data, the Coast Guard estimates that mariners who live or reside less than 93.9 miles from a training provider would commute to the closest site without lodging or utilizing overnight accommodations. We base this assumption on a report titled, “Commuting in America (2): The National Report on Commuting Patterns and Trends,” from the American Association of State Highway and Transportation Officials, which posits that Americans, on average, are willing to spend up to a maximum of 90 minutes commuting to work each way.⁴¹ This report, which used data from the American Community Survey, illustrates that approximately 97.5 percent of American commuters spent 90 minutes (1.5 hours) or less commuting to work.⁴² To convert 90 minutes into a distance, we calculate an average driving speed using data from the Department of Transportation (DOT's) National Highway Traffic Safety Administration's report, “National Traffic Speeds Survey III: 2015.”⁴³ From this report, we take the mean speed from the three road classes across the five time periods provided. We obtain an average speed of 62.6 mph. We then multiply the average speed of these three road classes by 1.5 hours (90 minutes) to obtain our commuting distance threshold of 93.9 miles ($62.6 \text{ mph} \times 1.5 \text{ hours}$).

⁴¹ The American Association of State Highway and Transportation Officials conducted the report in 2013 and used Census Bureau data in the report. Please see Figure 11-13 on page 16 to obtain the travel distribution time to work in minutes. Readers can access the report at <https://transportation.org/traveltrends/commuting-in-america/brief-13-11-commuting-departure-time-and-trip-time/>. Last accessed August 18, 2026.

⁴² The American Community Survey is an ongoing survey by the U.S. Census Bureau. It regularly gathers information pertaining to demographics and housing characteristics of U.S. households. More information on this survey can be found at: <https://www.census.gov/programs-surveys/acs/about.html> (last visited August 18, 2026). For information on “mega-commuting” refer to footnote 29 or this brochure from the ACS: <https://www.census.gov/content/dam/Census/library/working-papers/2013/demo/SEHSD-WP2013-03.pdf> (last visited August 18, 2026).

⁴³ In order to convert this to distance, we take the mean total of table 12's Speed by Road Type and Time of Day estimates from 2015 to get an average road speed of 62.6 miles per hour. This information can be found in table 12 using the “Download Document” link for Publication No. DOT HS 812 485 (March 2018) at this website: <https://rosap.nhtl.bts.gov/view/dot/35961> (last visited August 18, 2026).

The next threshold we estimated is the distance at which a mariner would choose to drive to the training provider and lodge for the duration of the training before returning to their place of residence. To determine this distance, we establish a range by calculating the minimum and maximum distances for this threshold. The minimum distance at which mariners would drive and lodge during training must be equal to the threshold established by those mariners commuting: 93.9 miles (188 miles round trip).

The National Household Travel Survey estimates that 94.3 percent of Americans travel by personal vehicle when making round trips of less than 500 miles.⁴⁴ We use this distance of 500 miles as the lower bound of our maximum distance threshold. To estimate the upper bound of our maximum distance threshold, we reference data from the Office of Airline Information report, “Average Length of Haul, Domestic Freight and Passenger Modes (Miles),” which calculated the average domestic passenger flight length of 938 miles (1,876 miles round trip) in 2024.⁴⁵ We use this average domestic passenger flight statistic because it reflects a distance at which the average American prefers flying over other modes of transportation when traveling from one location to another.

Additionally, to validate the value of an 1,876 miles round trip, we reference the National Household Travel Survey data. A round-trip distance of 1,876 miles is close to the 2,000

⁴⁴ The BTS conducted the National Household Travel Survey in 2001, and it was last updated in May of 2017. Please see table 4, “Percent of Long-Distance Trips by Mode and Roundtrip Distance” to obtain the travel distance distribution of trips by miles and travel mode. Readers can access the table at: <https://rosap.ntl.bts.gov/view/dot/5475>. The table was accessed on August 18, 2026.

⁴⁵ The Office of Airline Information at the BTS collects air freight and domestic passenger summary data. This office divides revenue passenger miles by revenue passenger enplanements to calculate the average length of passenger trips. To find the average length of a domestic flight, please see table 1-38, “Average Length of Haul, Domestic Freight and Passenger Modes (Miles)” and refer to cell AM:13. Readers can access the table at: <https://www.bts.gov/content/average-length-haul-domestic-freight-and-passenger-modes-miles>. The table was accessed on August 18, 2026.

plus miles round-trip distance category used by the National Household Travel Survey. For trips of over 2,000 miles round trip, 22.2 percent of Americans would travel by car and 74.8 percent would travel by flying. We then average our lower and upper bounds for the maximum distance threshold to obtain an average maximum distance of 1,188 miles $[(500 \text{ miles} + 1,876 \text{ miles}) \div 2]$, or 594 miles one-way.

Therefore, the Coast Guard determines that, beyond 594 miles between a mariner's place of residence and the training provider they attended, mariners would choose to fly and lodge instead of drive and lodge. Table 9 displays the distance thresholds for all three choices of transportation.

Table 9: Modes of Travel and Travel Distance Thresholds

Travel choice	Travel distance (one-way) threshold for a mariner to reach their nearest training provider denoted by x
Commute	$x < 93.9 \text{ miles.}$
Drive and Lodge	$93.9 \text{ miles} \leq x \leq 594 \text{ miles.}$
Fly and Lodge	$x > 594 \text{ miles.}$

The Coast Guard did not apply any of the cost estimates detailed in the following methodology (opportunity cost of travel time, monetary cost of travel, and meals and incidental expense rates (M&IE) and lodging costs) to mariners meeting the standard of competence in LTW skills because mariners can achieve this at their place of work (onboard a vessel) and no travel outside of work would be required.

We then used the percentages from table 9 to estimate how many mariners from our affected population (172 for LMS + 25 for BRM + 460 for ETSO) would choose to commute, drive and lodge, or fly and lodge to their closest training provider by multiplying the percentages above by the affected population. For mariners taking LMS

training: 34 (172×0.20) would commute, 80 (172×0.46)⁴⁶ would drive and lodge, and 58 (172×0.34) would fly and lodge. For mariners taking BRM training: 4 (25×0.20)⁴⁷ would commute, 12 (25×0.46) would drive and lodge, and 9 (25×0.34).⁴⁸ For mariners taking ETSO training: 92 (460×0.20) would commute, 212 (460×0.46) would drive and lodge, and 156 (460×0.34) would fly and lodge.⁴⁹ Table 10 shows these numbers.

Table 10: Travel Distribution by Mode for Affected Population

Transportation	Commute	Drive and Lodge	Fly and Lodge	Total
Percentage	20%	46%	34%	100%
Number of Deck Officers taking LMS Training	34	80 ⁵⁰	58	172
Number of Mariners taking BRM Training	4 ⁵¹	12	9	25
Number of Mariners taking ETSO Training	92	212	156	460

After establishing the travel distributions, we examined the costs associated with each mode of travel. Four inputs comprise these costs: the opportunity cost of travel

⁴⁶ 80 is rounded up. 172 multiplied by 0.46 equals 79.12 which ordinarily rounds to 79. However, 34 plus 79 plus 58 equals 171, which is less than the annual average of 172 mariners taking LMS training. To rectify this, we decided to round up for one of the transportation modes. Because mariners are most likely to drive and lodge, we rounded up that transportation mode to 80.

⁴⁷ 4 is rounded down. 25 multiplied by 0.20 equals 5.00 which ordinarily rounds to 5. However, 5 plus 12 plus 9 equals 26, which is more than the annual average of 25 mariners taking BRM training. To rectify this, we decided to round down for one of the transportation modes. Because mariners are least likely to commute, we rounded down that transportation mode to 4.

⁴⁸ All numbers rounded to nearest whole figure.

⁴⁹ All numbers rounded to nearest whole figure.

⁵⁰ 80 is rounded up which ordinarily rounds to 79. However, 34 plus 79 plus 58 equals 171, which is less than the annual average of 172 mariners taking LMS training. To rectify this, we decided to round up for one of the transportation modes. We decided that because mariners are most likely to drive and lodge, we should round up that transportation mode to 80.

⁵¹ 4 is rounded down which ordinarily rounds to 5. However, 5 plus 12 plus 9 equals 26, which is more than the annual average of 25 mariners taking BRM training. To rectify this, we decided to round down for one of the transportation modes. We decided that because mariners are least likely to commute, we should round down that transportation mode to 4.

time, the direct costs of travel, M&IE, and lodging costs (if applicable). Each of these is discussed below.

Opportunity Cost of Travel Time

A mariner incurs an opportunity cost during the time spent traveling to the closest LMS, BRM, or ETSO training provider. To calculate these opportunity costs, we utilized the commuting distances and times calculated in CG-MMC Policy Letter 01-21. The policy letter calculated that the average commuter faces a 61.2-mile round trip, and those driving and lodging face approximately a 498.8-mile round trip.⁵²

Next, we calculated the opportunity cost of travel. To calculate these costs, we took the recommended hourly values of travel time savings from the DOT, \$25.40 for intercity business travel driving and \$63.20 for intercity business travel flying.⁵³ First, we adjusted the value to 2025 dollars using the Employment Cost Index (ECI). We then multiplied it by the average time required to travel to and from the closest training provider. The ECI in 2015 was 124.3 ($[123.6 + 123.8 + 124.6 + 125.1] \div 4$, rounded), and the ECI in 2025 was 172.0 ($[169.9 + 171.4 + 172.9 + 173.6] \div 4$, rounded), giving a multiplier of 1.4 ($172.0 \div 124.3$, rounded).⁵⁴ For mariners commuting (and not lodging), it would take an average round-trip time of approximately 1.0 hours to commute to a training provider, the average round-trip distance divided by the average mean speed (61.2 miles round trip $\div$ 62.6 mph, rounded). Similarly, we performed this calculation for those mariners driving and lodging to get an average round-trip time of about 8.0 hours

⁵² The calculations for average trip distances were obtained from page 31 of the CG-MMC Policy Letter 01-21: Guidelines for Qualifying for STCW Endorsements for Basic and Advanced IGF Code Operations cost analysis. See <https://www.regulations.gov/document/USCG-2020-0181-0002> (last visited August 18, 2026).

⁵³ Table 3 (page 17) of White, Vinn. September 27, 2016. “Revised Departmental Guidance on Valuation of Travel Time in Economic Analysis.” www.transportation.gov/sites/dot.gov/files/docs/2016%20Revised%20Value%20of%20Travel%20Time%20Guidance.pdf (accessed June 4, 2026)

⁵⁴ At www.bls.gov/web/eci/eci-historical-dataset.xlsx (accessed August 19, 2026). We used the value for **Estimate** with the following filters: **Ownership**: Civilian works; **Characteristic**: All workers; **Industry**: All industries; **Occupation**: All occupations; **Geographic Area**: United States (National); **Estimate Type**: Total compensation; **Periodicity**: Current dollar index numbers; **Year**: 2015 and 2025.

(498.8 miles round trip ÷ 62.6 mph). However, mariners driving (and lodging) would be traveling only half of the round-trip distance, or 4.0⁵⁵ hours twice (8.0 ÷ 2), the day of arrival and the day of departure (each). The Coast Guard assumes that it would take mariners the equivalent of an entire workday (8 hours) to fly to a training provider and an entire workday to fly back to their place of residence.⁵⁶

For each travel mode, we multiplied the loaded mean hourly wage rate by the average commuting time, the days traveling, and the number of mariners traveling to arrive at the total opportunity costs of travel for our affected population. Table 11 presents the opportunity cost of travel per deck officers by travel type for LMS training. We estimate the total undiscounted opportunity cost of travel time for 172 deck officers taking LMS training to be about \$81,352 annually. Unless presented otherwise, numbers in tables 11, 12, and 13 are rounded to the nearest whole number. To get the opportunity cost of travel time, we multiplied the hourly values of travel times savings (\$63.20 or \$25.40) by the ECI multiplier (1.4) to get \$88 ($\63.20×1.4) or \$36 ($\25.40×1.4).

Table 11: Total Opportunity Costs (Undiscounted) of Travel Time by Travel Type for Deck Officers Going to LMS Training (\$2025)

	Commuting Time per Day (hours)	Days Traveling	Opportunity Cost of Travel Time (2025 dollars)	Number of Deck Officers	Total Opportunity Cost
Mode of Travel	(a)	(b)	(c)	(d)	(e) = (a) × (b) x (c) × (d)
Flying to Training Provider	8.0	2	\$88	34	\$47,872
Driving to Training Provider and Lodging	4.0	2	\$36	80	\$23,040

⁵⁵ Rounded to the nearest tenth.

⁵⁶ This again follows the assumption of the CG-MMC Policy Letter 01-21: Guidelines for Qualifying for STCW Endorsements for Basic and Advanced IGF Code Operations cost analysis. See <https://www.regulations.gov/document/USCG-2020-0181-0002> (last visited August 18, 2026).

Commuting to Training Provider	1.0	5	\$36	58	\$10,440
Total	-	-	-	172	\$81,352

Table 12 presents the opportunity cost of travel per mariner by BRM training.

We estimate the total undiscounted opportunity cost of travel time for 25 mariners taking BRM training to be about \$10,384 annually.

Table 12: Total Opportunity Costs (Undiscounted) of Travel Time by Travel Type for Mariners Going to BRM Training

	Commuting Time per Day (hours)	Days Traveling	Opportunity Cost of Travel Time (2025 dollars)	Number of Mariners	Total Opportunity Cost
Mode of Travel	(a)	(b)	(c)	(d)	(e) = (a) × (b) × (c) × (d)
Flying to Training Provider	8.0	2	\$88	4	\$5,632
Driving to Training Provider and Lodging	4.0	2	\$36	12	\$3,456
Commuting to Training Provider	1.0	4	\$36	9	\$1,296
Total				25	\$10,384

Table 13 presents the opportunity cost of travel per mariner by ETSO training.

We estimate the total undiscounted opportunity cost of travel time for 460 mariners taking ETSO training to be about \$241,136 annually.

Table 13: Total Opportunity Costs (Undiscounted) of Travel Time by Travel Type for Mariners Going to ETSO Training

	Commuting Time per Day (hours)	Days Traveling	Opportunity Cost of Travel Time (2025 dollars)	Number of Mariners	Total Opportunity Cost
--	--------------------------------	----------------	--	--------------------	------------------------

Mode of Travel	(a)	(b)	(c)	(d)	(e) = (a) × (b) × (c) × (d)
Flying to Training Provider	8.0	2	\$88	92	\$129,536
Driving to Training Provider and Lodging	4.0	2	\$36	212	\$61,056
Commuting to Training Provider	1.0	9	\$36	156	\$50,544
Total				460	\$241,136

Direct Cost of Travel

We assume that mariners who commute or drive and lodge use their own personal vehicles. To account for the direct costs of driving, such as gasoline, insurance, and wear and tear, we used the reimbursement rates from the GSA.⁵⁷ The GSA approximates the privately-owned vehicle mileage reimbursement rate to be \$0.70 per mile in 2025 dollars.⁵⁸ To calculate the direct costs of travel for those mariners commuting and not lodging, we multiplied this reimbursement rate by the number of days a mariner commutes (5 days for LMS, 4 days for BRM, and 9 days for ETSO)⁵⁹ and by the average round-trip distance for commuting, 61.2 miles. We used this same method when calculating the costs for those mariners driving and lodging with the difference being they spend the equivalent of two days when completing their round-trip distance of 498.8 miles. Therefore, a deck officer commuting to LMS training would incur direct costs of

⁵⁷ The GSA's privately owned vehicle mileage reimbursement rate covers the costs associated with using a personal vehicle for official government travel. This rate encompasses both fixed and variable costs of operating the vehicle. Specifically, it includes expenses like gasoline, oil, tires, maintenance, repairs, insurance, registration, and depreciation. However, it does not include the cost of parking or tolls.

⁵⁸ <https://www.gsa.gov/travel/plan-a-trip/transportation-airfare-rates-pov-rates/pov-mileage-reimbursement> (accessed August 19, 2026).

⁵⁹ We assume that one day of a course is eight hours. From table 3, the average length of an LMS course is 37 hours. Rounding up, this equates to 5 days (37 hours divided by 8 hours per day). From table 4, the average length of a BRM course is 27 hours. Rounding, this equates to 4 days (27 hours divided by 8 hours per day). Recall, from earlier in this Regulatory Analysis, that the STAR Center offers a 9-day ETSO course.

travel of \$214 ($\0.70 reimbursement rate $\times$ 61.6 miles $\times$ 5 days), a mariner commuting to BRM training would incur a direct cost of travel of \$171 ($\0.70 reimbursement rate $\times$ 61.6 miles $\times$ 4 days), and a mariner commuting to ETSO training would incur a direct cost of travel of \$386 ($\0.70 reimbursement rate $\times$ 61.6 miles $\times$ 9 days).⁶⁰ For a mariner traveling by personal vehicle and then lodging for the duration of the training (driving on the first day and returning on the last day of the training), the direct cost of travel would be about \$349 (498.8 miles $\times$ $\$0.70$ reimbursement rate). Lastly, for a mariner flying and lodging, we used the average cost of a round-trip flight in 2025 as an approximation for the direct cost of travel associated with traveling by air. Using this data from the BTS, we estimated the average unadjusted round-trip airfare to be \$387.⁶¹

In addition to paying for round-trip airfare, mariners flying and lodging would need taxi fare to and from the airport. To calculate the round-trip airport transfer, we used the value of \$50,⁶² and inflated this value using the 2025 and the 2006 GDP implicit price deflator values of 128.979 and 84.071, respectively.⁶³ After dividing the values, we obtained a factor of about 1.534. We multiplied this value by \$50 to obtain a transfer cost of about \$77 in 2025 dollars.⁶⁴ We request comments on this cost.

Table 14 presents the direct costs of travel associated with deck officers completing LMS training. We estimate the total undiscounted direct costs of travel for 172 deck officers taking LMS training to be about \$56,108 annually.

⁶⁰ We multiplied by 5 days a week for deck officers commuting to LMS training because the average training time is 37 hours to complete, which is essentially equivalent to 5 business days. For mariners commuting to BRM training, we multiplied by 4 days a week because the average training time is 27 hours to complete, which is equivalent to 4 business days.

⁶¹ www.bts.gov/content/annual-us-domestic-average-itinerary-fare-current-and-constant-dollars (accessed August 19, 2026).

⁶² We adjusted for inflation the value of the round-trip airport transfer presented in table 4 in the following link: <https://www.federalregister.gov/d/06-369>.

⁶³ <https://fred.stlouisfed.org/series/A191RD3A086NBEA>, (accessed August 19, 2026).

⁶⁴ This methodology parallels that found in 85 FR 31677 at page 31684.

**Table 14: Annual Direct Costs of Travel (Undiscounted) for Deck Officers
Completing LMS Training (\$2025)**

	Mileage/Airfare cost	Cost to Take a Taxi to and from Airport	Number of Deck Officers	Total Cost
Mode of Travel	(a)	(b)	(c)	(d) = [(a) + (b)] × (c)
Flying and lodging	\$387	\$77	34	\$15,776
Driving and lodging	\$349	\$0	80	\$27,920
Commuting	\$214	\$0	58	\$12,412
Total			172	\$56,108

Table 15 presents the direct costs of travel associated with mariners completing BRM training. We estimate the total undiscounted direct costs of travel for 25 mariners taking BRM training to be about \$7,583 annually.

**Table 15: Annual Direct Costs of Travel (Undiscounted) for Mariners Completing
BRM Training (\$2025)**

	Mileage/Airfare cost	Cost to Take a Taxi to and from Airport	Number of Mariners	Total Cost
Mode of Travel	(a)	(b)	(c)	(d) = [(a)+(b)] × (c)
Flying and lodging	\$387	\$77	4	\$1,856
Driving and lodging	\$349	\$0	12	\$4,188
Commuting	\$171	\$0	9	\$1,539
Total			25	\$7,583

Table 16 presents the direct costs of travel for mariners completing the ETSO training. We estimate the total undiscounted direct costs of travel for 460 mariners taking ETSO training to be about \$176,892 annually.

Table 16: Annual Direct Costs of Travel (Undiscounted) for Mariners Completing ETSO Training

	Mileage/Airfare cost	Cost to Take a Taxi to and from Airport	Number of Mariners	Total Cost
Mode of Travel	(a)	(b)	(c)	(d) = [(a)+(b)] × (c)
Flying and lodging	\$387	\$77	92	\$42,688
Driving and lodging	\$349	\$0	212	\$73,988
Commuting	\$386	\$0	156	\$60,216
Total			460	\$176,892

Meal and Incidental Expense (M&IE) Rates and Lodging Costs

Mariners incur M&IE during training and travel days and mariners not commuting incur lodging expenses during training days. To calculate the average M&IE for our affected population, the Coast Guard calculated an average of these expenses based on GSA travel per diem rates for calendar year 2025 for the areas the course providers are located in.⁶⁵ For example, we found the M&IE cost for mariners in ZIP code 23072, where the Chesapeake Marine Training Institute is located, to be \$68 on average during calendar year 2025 (see table 17). Averaging over all course provider ZIP codes, we obtain an average cost for M&IE of about \$83 for LMS courses, \$86 for BRM courses, and \$86 for ETSO courses during training days. For travel days, we multiplied

⁶⁵ To obtain information on the GSA per diem or M&IE, the reader should access the following website: www.gsa.gov/travel/plan-book/per-diem-rates (accessed August 19, 2026). We entered each training center's ZIP Code into the search function for the 2024 and 2025 Fiscal Year to find the respective M&IE and lodging rates; we did this for our deck officer population. Because GSA tabulates per diem for the 48 contiguous states, we needed to find the per diem rates for the US Virgin Islands. We used the following website for this information: www.travel.dod.mil/Travel-Transportation-Rates/Per-Diem/Per-Diem-Rate-Lookup/ (accessed August 19, 2026). The reader should search for "Virgin Islands (U.S.)" in the tab denoted as "Foreign & Non-Foreign OCONUS."

this value by 0.75 based on GSA guidance to obtain an M&IE cost of about \$62 ($\83×0.75) for LMS courses, about \$65 ($\86×0.75) for BRM courses, and about \$65 ($\86×0.75) for ETSO courses.⁶⁶ During the first and last day of travel, GSA calculates that Federal employees are only eligible for 75 percent of the total M&IE rate for their temporary duty travel location.⁶⁷ We used this reimbursement rate as an approximation for what mariners would spend on their first and last travel day; however, for mariners commuting, we applied this rate for the duration of their training.

We multiplied the weighted M&IE value during training days by 5 (number of days) for deck officers receiving LMS training to get \$415 ($5 \times \86). We multiplied the same M&IE value by 4 (number of days) for mariners receiving BRM training to get \$344 ($4 \times \86). We multiplied the M&IE value by 11 (9 training days + 2-day weekend) for mariners receiving ETSO training to obtain \$946 ($11 \times \86). Then, we multiplied the M&IE value during travel days by 2 (number of days traveling) to obtain a value of about \$124 for deck officers driving and lodging to LMS training ($2 \times \$62$), \$130 for the mariners driving and lodging to BRM training ($2 \times \$65$), and \$130 for the mariners driving and lodging to ETSO training ($2 \times \$65$). See table 17.

⁶⁶ Rounded to closest whole number.

⁶⁷ www.gsa.gov/travel/plan-a-trip/per-diem-rates/faqs#15, (accessed June 4, 2026).

Table 17: Values for M&IE and Lodging

Training Provider	ZIP code	Average Daily Lodging Rate over the span of a Year (2025 dollars)	Average M&IE	M&IE During Travel Days	Average Daily Lodging Rate Including Tax	LMS course offered?	BRM course offered?	ETSO course offered?
Captain School USVI	00802	\$354	\$150	\$113	\$404	No	Yes	No
Northeast Maritime Institute	02719	\$126	\$80	\$60	\$144	Yes	Yes	No
Maine Maritime Academy - Continuing Education	04420	\$194	\$92	\$69	\$222	Yes	No	No
State University New York Maritime College - Department of Professional Education & Training	10465	\$277	\$92	\$69	\$316	Yes	No	No
Maritime Institute of Technology & Graduate Studies	21090	\$143	\$80	\$60	\$163	Yes	Yes	No
Chesapeake Marine Training Institute	23072	\$110	\$68	\$51	\$126	Yes	Yes	No
Maritime Institute	23513	\$110	\$68	\$51	\$126	Yes	Yes	No
RCM Maritime, LLC	29420	\$246	\$92	\$69	\$281	Yes	No	No
Quality Maritime Training, LLC	32250	\$110	\$68	\$51	\$126	Yes	Yes	No
STAR Center	33004	\$177	\$86	\$65	\$202	Yes	No	Yes
Maritime Professional Training	33316	\$177	\$86	\$65	\$202	Yes	Yes	No
Delgado Community College	70119	\$158	\$80	\$60	\$180	Yes	No	No
San Jacinto College Maritime Technology & Training Center	77571	\$128	\$80	\$60	\$146	Yes	Yes	No
Maritime Institute	92110	\$205	\$86	\$65	\$234	Yes	Yes	No
Maritime Institute	98020	\$120	\$86	\$65	\$137	Yes	No	No
Eat on the Wild Side - Crawford Nautical Training	98107	\$208	\$92	\$69	\$238	Yes	Yes	No
Maritime Institute of Technology & Graduate Studies	98134	\$208	\$92	\$69	\$238	Yes	No	No
Average if LMS course offered		\$169	\$83	\$62	\$193			
Average if BRM course offered		\$167	\$86	\$65	\$191			
Average if ETSO course offered		\$177	\$86	\$65	\$202			

Note: The reimbursement rates for lodging from the GSA do not include taxes (see www.gsa.gov/travel/plan-a-trip/per-diem-rates/faqs#11, (accessed August 20, 2026). To calculate the “Average Daily Lodging Rate Including Tax” column, we take the “Average Daily Lodging Rate over the span of a Year (2025)” and multiplying it by 14.19 percent (the average total lodging tax rate

in the 150 largest US cities⁶⁸) and then adding that value to the “Average Daily Lodging Rate over the span of a Year (2025)” column. For example, in the first row we multiplied \$354 by 0.1419 and added it to \$354 to get \$404 ($\$354 \times 0.1419 + \354).⁶⁹ We repeated this process for the remaining rows. The average of these totals is approximately \$193 for training providers offering LMS courses and \$191 for training providers offering BRM courses. This number is the average for our average daily lodging rate for our affected population. Similarly, we did the same multiplication with the “Average M&IE Rate” and the “M&IE during Travel Days” columns to get an average rate of \$83 and \$62, respectively, for training providers offering LMS courses.

⁶⁸ Hazinski, Thomas A. and Michael Ferguson. September 23, 2024. 2024 HVS Lodging Tax Report – USA. www.hvs.com/article/10015-2024-hvs-lodging-tax-report-usa (accessed August 20, 2026).

⁶⁹ Rounded to closest whole number.

Similarly, we applied this M&IE rate during travel days to each day of training for mariners commuting to obtain a total of \$310 ($\62×5 days) for deck officers completing LMS training, \$260 ($\65×4 days) for mariners completing BRM training, and \$585 ($\65×9 days) for mariners completing ETSO training.⁷⁰ We applied this cost to mariners commuting because every day a mariner is in training is also considered a travel day.

We applied the same weighting method when calculating the average lodging costs for mariners taking LMS, BRM, and ETSO training. The costs for the average daily lodging rate include the daily lodging per diem rate, the state sales tax rate, and the lodging sales tax rate. The GSA provides the daily per diem rate for lodging costs. A 14.34 percent lodging tax was added to the lodging per diem.⁷¹ After applying the tax, we estimated the average lodging rate to be \$193 per deck officer attending LMS training per day, \$191 per mariner attending BRM training per day, and \$202 per mariner attending ETSO training per day, based on the average daily lodging rate in the ZIP codes of the training providers. Using the same example as above, we found the lodging rate for ZIP Code 23072 to be \$126 ($\110×1.1434 which includes the 14.34 percent total tax rate for lodging). Averaging over all course provider ZIP codes, we obtained a total average cost for lodging of about \$193 for deck officers attending LMS training, \$191 for mariners attending BRM training, and \$202 for mariners attending ETSO training. For LMS, BRM, and ETSO training, we estimate the lodging costs to be about \$965 ($\193×5 days) and \$764 ($\191×4 days), and \$2,222 ($\202×11 days), respectively. Table 18 details the total undiscounted costs for M&IE and lodging expenses for deck officers

⁷⁰ Some mariners commute to ETSO training, and some drive and lodge or fly to ETSO training, as shown in table 9. ETSO training is nine days. For commuters, they would only have to commute on days of training, i.e., nine days. For mariners who drive and lodge or fly, they would incur M&IE and lodging expenses on the weekend as well, i.e., their M&IE and lodging rates are based on 11 days.

⁷¹ Average total lodging tax rate in the 150 largest US cities *from* Hazinski, Thomas A. and Henry Detmer. October 29, 2025. 2025 HVS Lodging Tax Report – USA. <https://www.hvs.com/article/10299-2025-lodging-tax-report-usa> (accessed August 24, 2026).

taking LMS training, table 19 details the total undiscounted costs for M&IE and lodging expenses for mariners taking BRM training, and table 20 details the total undiscounted costs for M&IE and lodging for mariners taking the ETSO training. We estimate the total undiscounted M&IE and lodging costs for 172 deck officers taking LMS training to be about \$222,610 annually.

Table 18: M&IE and Lodging Costs (Undiscounted) for Deck Officers Completing LMS Training (\$2025)

	M&IE at travel location	Lodging Costs	M&IE on Travel Days	Number of Deck Officers	Total Cost
Mode of Travel	(a)	(b)	(c)	(d)	(e) = [(a)+(b)+(c)] × (d)
Flying and lodging	\$415	\$965	\$415	34	\$61,030
Driving and lodging	\$415	\$965	\$415	80	\$143,600
Commuting	\$0	\$0	\$310 ⁷²	58	\$17,980
Total				172	\$222,610

We estimate the total undiscounted M&IE and lodging costs for 25 mariners taking BRM training to be about \$22,148 annually.

Table 19: M&IE and Lodging Costs (Undiscounted) for Mariners Completing BRM Training (\$2025)

	M&IE at travel location	Lodging Costs	M&IE on Travel Days	Number of Mariners	Total Cost
Mode of Travel	(a)	(b)	(c)	(d)	(e) = [(a)+(b)+(c)] × (d)
Flying and lodging	\$344	\$764	\$130	4	\$4,952
Driving and lodging	\$344	\$764	\$130	12	\$14,856
Commuting	\$0	\$0	\$260 ⁷³	9	\$2,340
Total				25	\$22,148

⁷² This value includes M&IE of 75% for mariners who commute to a training center every day.

⁷³ This value includes M&IE of 75% for mariners who commute to a training center every day.

We estimate the total undiscounted M&IE and lodging costs for 460 mariners taking the ETSO training to be about \$1,093,852 annually.

Table 20: M&IE and Lodging Costs (Undiscounted) for Mariners Completing ETSO Training

	M&IE at travel location	Lodging Costs	M&IE on Travel Days	Number of Mariners	Total Cost
Mode of Travel	(a)	(b)	(c)	(d)	(e) = [(a)+(b)+(c)] × (d)
Flying and lodging	\$946	\$2,222	\$130	92	\$303,416
Driving and lodging	\$946	\$2,222	\$130	212	\$699,176
Commuting	\$0	\$0	\$585 ⁷⁴	156	\$91,260
Total				460	\$1,093,852

Cost to Compile Documentation for an MMC Application

In addition to the costs associated with travel, mariners must provide supporting documentation to form CG-719B, Application for MMC, to verify training or skill assessments. Therefore, mariners incur an opportunity cost of time when compiling the necessary documentation. According to a subject matter expert (SME) at the NMC who processes these applications, it takes a mariner an average of 5 minutes (approximately 0.083 hours) to compile training certificates or documentation of meeting the standard of competence to submit to the NMC for evaluation.

Based on our affected population, we estimate there would be 172 deck officers who would compile LMS training certificates, 25 mariners who would compile BRM training certificates, 84 mariners who would compile evidence of meeting the standard of competence in LTW skills, and 460 mariners who would compile ETSO training certificates on an annual basis. Using the loaded hourly wage rate data for those deck officers completing LMS training, \$70.82, those mariners completing BRM training,

⁷⁴ This value includes M&IE of 75% for mariners who commute to a training center every day.

\$38.79, and those mariners completing ETSO training, \$76.33, we estimate the total cost to mariners to submit LMS, BRM, and ETSO training certificates and evidence of meeting the standard of competence in LTW skills. We estimate the total cost to mariners to be approximately \$4,275 annually $[(\$70.82 \times 0.083 \times 172) + (\$38.79 \times 0.083 \times 25) + (\$38.79 \times 0.083 \times 84) + (\$76.33 \times 0.083 \times 460)]$. Table 21 presents these costs.

Table 21: Annual Costs to Compile Documentation for an MMC

	Loaded Mean Hourly Wage Rate	Time per Submission (hours)	Population	Total Cost
Population	(a)	(b)	(c)	(d) = (a) × (b) × (c)
Deck Officers Submitting LMS Training Certificates	\$70.82	0.083	172	\$1,011
Mariners Submitting BRM Training Certificates	\$38.79	0.083	25	\$80
Mariners Submitting Evidence of meeting the Standard of Competence in LTW Skills	\$38.79	0.083	84	\$270
Mariners Submitting ETSO Training Certificates	\$76.33	0.083	460	\$2,914
Total			741	\$4,275

Total Cost to Mariners

We estimate the total undiscounted annual costs for deck officers taking LMS training by adding the total costs in tables 7, 8, 11, 14, 18, and 21, for mariners taking BRM training by adding the total costs in tables 7, 8, 12, 15, 19, and 21, for mariners taking ETSO training by adding the total costs in tables 7, 8, 13, 16, 20, and 21, and for mariners demonstrating meeting the standard of competence in LTW skills by adding the total costs in tables 8 and 21. We estimate the total undiscounted annual cost for deck officers who take the LMS training to be \$991,977 (\$192,296 total cost to take LMS training + \$438,600 total opportunity cost to take the training + \$81,352 total opportunity costs of travel for deck officers + \$56,108 direct costs of travel + \$222,610 M&IE and lodging costs + \$1,011 opportunity cost to compile MMC application documentation). Similarly, we estimate the total undiscounted annual cost for mariners taking the BRM training to be \$98,545 annually (\$32,175 total cost to take training + \$26,175 total opportunity cost to take the training + \$10,384 total opportunity cost of travel for mariners + \$7,583 direct costs of travel + \$22,148 M&IE costs and lodging costs + \$80 training certificate submission costs). Similarly, we estimate the total undiscounted annual cost for mariners taking the ETSO training to be \$4,920,634 annually (\$948,060 total cost to take training + \$2,457,780 total opportunity cost to take the training + \$241,136 total opportunity cost of travel for mariners + \$176,892 direct costs of travel + \$1,093,852 M&IE costs and lodging costs + \$2,914 training certificate submission costs). Lastly, we estimate the total undiscounted (opportunity) annual cost for mariners demonstrating meeting the standard of competence in LTW skills to be \$83,094 (\$82,824 opportunity costs of demonstrating LTW skills + \$270 opportunity cost to compile MMC application documentation). Table 22 presents a summary of these total costs.

Table 22: Total Undiscounted Annual Costs for Mariners Taking LMS Training, BRM Training, and Meeting the Standard of Competence in LTW Skills

	Tuition Cost	Opportunity Costs Training / Assessment	Opportunity Cost of Travel per Mariner by Travel Type	Direct costs of travel	Meals, Incidentals and Lodging Costs	Opportunity Cost MMC Application	Total Annual Costs
Type of Training / Assessment	(a)	(b)	(c)	(d)	(e)	(f)	(g) = (a) + (b) + (c) + (d) + (e) + (f)
LMS Training	\$196,768	\$438,600	\$81,352	\$56,108	\$222,610	\$1,011	\$991,977
BRM Training	\$32,175	\$26,175	\$10,384	\$7,583	\$22,148	\$80	\$98,545
ETSO Training	\$948,060	\$2,457,780	\$241,136	\$176,892	\$1,093,852	\$2,914	\$4,920,634
LTW Skills	-	\$82,824	-	-	-	\$270	\$83,094
Totals	\$1,172,531	\$3,005,379	\$332,872	\$240,583	\$1,338,610	\$4,275	\$6,094,250

Cost to the Federal Government

To estimate the cost to the Federal Government, the Coast Guard examined the evaluation process for MMC applications. According to SMEs at the NMC who review MMC applications, Federal employees with a pay grade of General Schedule (GS)-07 review incoming LMS, BRM, and ETSO training certificates and evidence of meeting the standard of competence in LTW skills. According to the GS published by the Office of Personnel Management for civilian government personnel, the hourly wage rate for a GS-07 employee at Step 5 in the Washington-Baltimore-Arlington locality is \$31.04 in 2025 dollars.⁷⁵

The Coast Guard calculated the share of total compensation of Federal Government employees to account for the non-wage benefits to determine the load factor that the Coast Guard applied to the hourly wage rate of employees. In a Congressional Budget Office (CBO) report titled “Comparing the Compensation of Federal and Private-Sector Employees in 2022,” the CBO reports total compensation of Federal Government employees to be approximately \$75.90, and wages and salaries to be approximately \$45.20.⁷⁶ From these values, the Coast Guard determined the load factor to be about 1.68⁷⁷ ($\$75.90 \div \45.20).

Multiplying by 1.68 to account for benefits and indirect costs paid for by the employer, the loaded hourly wage rate is \$52.15 in 2025 dollars ($\$31.04 \text{ hourly wage} \times 1.68$). The Coast Guard does not have sufficient data to assess the cost of review for ETR training certificates.

⁷⁵ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/DCB.aspx> (accessed August 24, 2026).

⁷⁶ Readers can view the report at, <https://www.cbo.gov/system/files/2024-04/59970-Compensation.pdf>. See Table 2-3 and Table 2-1 of the report, respectively. The Coast Guard last accessed this report in August 2026.

⁷⁷ Rounded to closest whole number.

We then estimated the cost of time it takes NMC personnel to review training certificates and evidence of meeting the standard of competence in LTW skills as part of the evaluation process for an STCW endorsement. According to personnel at the NMC familiar with processing MMC applications, an evaluator takes 2.5 minutes to ensure all required documentation is present in an application; additionally, 5 percent of the time, the application may need further review because of inconsistencies in documentation, which requires 10 minutes. To calculate the initial review cost, the Coast Guard calculated this time in hours ($2.5 \text{ minutes} \div 60 \text{ minutes/hour}$) or 0.042 hours. To calculate the cost of further review, we multiplied 5 percent by the number of certificates or assessments being reviewed (172, 25, and 460, respectively) and multiplied these numbers by the time it takes to conduct a further review, or 0.167 hours ($10 \text{ minutes} \div 60 \text{ minutes/hour}$). Table 23 presents the total annual undiscounted cost of reviewing an LMS, BRM, or ETSO training certificate or documentation of LTW skills as well as the cost of any further review time that may be required. We estimate the total annual undiscounted cost to the Federal Government to perform the necessary reviews to be approximately \$1,947.

Table 23: Total Undiscounted Cost for Coast Guard Review of LMS or BRM Training Certificates or Demonstration of LTW Skills (\$2025)

	Time to Review (in hours)	Number of Certificates being Reviewed	Percent of Time Review is Required	Loaded Hourly Wage Rate of Evaluator	Total
Cost Category	(a)	(b)	(c)	(d)	(e) =(a) × (b) × (c) × (d)
Initial review LMS	0.042	172	100%	\$52.15	\$377
Initial review BRM	0.042	25	100%	\$52.15	\$55
Initial review ETSO	0.042	460	100%	\$52.15	\$1,008
Initial review LTW Skills	0.042	84	100%	\$52.15	\$184
Further review LMS	0.167	172	5%	\$52.15	\$75
Further review BRM	0.167	25	5%	\$52.15	\$11
Further review ETSO	0.167	460	5%	\$52.15	\$200
Further review LTW Skills	0.167	84	5%	\$52.15	\$37
Total					\$1,947

Summary of Total Cost Savings

The Coast Guard does not anticipate mariners or the Federal Government to incur any costs with this proposed rule. To obtain the total undiscounted cost savings of \$6,096,197 for this proposed rule, we added the total undiscounted costs in table 22 (\$6,094,250) to the total undiscounted costs in table 23 (\$1,947). Since the rule removes these requirements, cost savings are represented as the avoided costs captured in tables 22 and 23. We estimate the total cost savings of this proposed rule to mariners and the Federal Government over a 10-year period of analysis to be about \$42,817,136, discounted at 7 percent and the annualized cost savings to be about \$6,096,197 using the same discount rate. Table 24 summarizes the aggregate cost savings of this proposed rule, which includes the cost savings to mariners and the Federal Government.

Table 24: Total Estimated Cost Savings of the Proposed Rule Over a 10-year Period of Analysis (2025\$)

		Total Cost	
Year	Total Undiscounted Cost Savings	7%	3%
1	\$6,096,197	\$5,697,380	\$5,918,638
2	\$6,096,197	\$5,324,655	\$5,746,250
3	\$6,096,197	\$4,976,313	\$5,578,884
4	\$6,096,197	\$4,650,760	\$5,416,392
5	\$6,096,197	\$4,346,504	\$5,258,633
6	\$6,096,197	\$4,062,153	\$5,105,469
7	\$6,096,197	\$3,796,405	\$4,956,766
8	\$6,096,197	\$3,548,042	\$4,812,394
9	\$6,096,197	\$3,315,927	\$4,672,227
10	\$6,096,197	\$3,098,997	\$4,536,143
Total	\$60,961,970	\$42,817,136	\$52,001,796
Annualized	-	\$6,096,197	\$6,096,197

Analysis of Annualized Cost Savings using a Perpetual Period of Analysis

Using a perpetual period of analysis, we estimate the total annualized cost savings of this proposed rule to be \$3,833,921 in 2024 dollars, using a 7-percent discount rate, with 2026 as the target implementation year.

Alternatives

Although not required by domestic statute or the minimum international standards contained in the STCW Convention or the STCW Code for these endorsements, the Coast Guard included these requirements in the 2013 final rule as a means to ensure safe vessel operations. The Coast Guard reviewed all MMC requirements and determined that the six discussed in this proposed rule were the only ones that could be removed without compromising the safe operation of applicable vessels.

The Coast Guard considered three alternatives beyond the selected proposal. This section examines how the cost of the proposal would change if this alternative were implemented in place of the proposed alternative.

(1) No Action

Using this alternative, the Coast Guard would accept the status quo and not remove either the LMS, BRM, or ETSO training requirements or the requirement to demonstrate meeting the standard of competence in LTW skills as discussed in this proposed rule for certain STCW endorsements. The Coast Guard would also not remove the training requirement discussed in this proposed rule for CSM or HVPS for ETRs. This alternative would not promote an equivalent compliance standard with international requirements and would not reduce the burden or create cost savings for mariners; therefore, we rejected this alternative. Table 26 displays the potential cost savings with the no action alternative as well as that associated with each alternative.

(2) Addressing Only Deck Endorsement Requirements

Under this alternative, the Coast Guard would divide the removal of requirements between deck and engineering endorsements. Specifically, the Coast Guard would:

- Remove the LMS training (46 CFR 11.317(a)(3)(v) and 11.317(b)(1)), BRM training (46 CFR 11.321(a)(3)(iv)), and LTS renewal requirement (46 CFR 11.321(b)(1)) for deck endorsements, including Masters and OICNW on vessels of less than 500 GT limited to near-coastal waters.
- Retain the ETSO training (46 CFR 11.329(a)(4)(v)) for OICEW and the CSM and HVPS training (46 CFR 12.611(a)(4)(i)) for ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more.

This approach would provide targeted regulatory relief for deck officers, reducing their training burden and associated costs, while maintaining certain training standards for engineering officers and ratings. The Coast Guard considered this alternative to ensure that any changes to training requirements would not compromise safety in engineering operations, which may present distinct risks.

However, the Coast Guard rejected this alternative because the retained engineering requirements are not mandated by the STCW Convention or the STCW Code and do not provide a demonstrable safety benefit beyond existing international standards. In addition, maintaining these requirements would not achieve the full regulatory burden reduction or international equivalency sought by the proposed rule. Therefore, this alternative would not fully align with the Coast Guard's objectives for this rulemaking.

(3) *Addressing Only Engine Endorsement Requirements*

Under this alternative, the Coast Guard would focus on removing requirements for engineering endorsements, while retaining those for deck endorsements. Specifically, the Coast Guard would:

- Remove the ETSO training (46 CFR 11.329(a)(4)(v)) for OICEW and the CSM and HVPS training (46 CFR 12.611(a)(4)(i)) for ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more.

- Retain the LMS training (46 CFR 11.317(a)(3)(v) and 11.317(b)(1)), BRM training (46 CFR 11.321(a)(3)(iv)), and LTW skills requirement (46 CFR 11.321(b)(1)) for deck endorsements, including Masters and OICNW on vessels of less than 500 GT limited to near-coastal waters.

This approach would provide regulatory relief and cost savings for engineering officers and ratings, while maintaining additional training requirements for deck officers and ratings. The Coast Guard considered this alternative to address the distinct operational and safety considerations associated with engineering roles, while continuing to require certain deck-related training believed to contribute to safe vessel operations.

However, the Coast Guard rejected this alternative because the retained deck requirements are not mandated by the STCW Convention or the STCW Code and do not provide a demonstrable safety benefit beyond existing international standards. Retaining these requirements would not achieve the full regulatory burden reduction or international equivalency sought by the proposed rule. Therefore, this alternative would not fully align with the Coast Guard's objectives for this rulemaking.

(4) *Preferred Alternative*

Under the preferred alternative, the Coast Guard would remove the following requirements:

- The LMS training described in 46 CFR 11.317(a)(3)(v) and 11.317(b)(1) for an STCW endorsement as Master of vessels of less than 500 GT limited to near-coastal waters;
- The BRM training described in 46 CFR 11.321(a)(3)(iv) for an STCW endorsement as an OICNW on vessels of less than 500 GT limited to near-coastal waters;

- Evidence of meeting the standard of competence in LTW skills to renew an STCW endorsement as OICNW on vessels of less than 500 GT limited to near-coastal waters in 46 CFR 11.321(b)(1);
- The ETSO training described in 46 CFR 11.329(a)(4)(v) for an STCW endorsement as OICEW; and
- The CSM and HVPS training to qualify as an ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more in 46 CFR 12.611(a)(4)(i).

This alternative would reduce the financial burden on mariners and the Federal Government by removing overly burdensome regulatory requirements. The cost savings associated with this alternative are greater than those associated with other alternatives.

Table 25: Alternatives (2025\$)

Alternative	Annualized Industry and Government Cost – Savings (7%)	Annualized Industry Cost – Savings (7%)	Impact of the Alternative
Alternative 1: No Action	\$0	\$0	The Coast Guard would continue to require training in LMS, BRM, ETSO, CSM, and HVPS, and demonstration of the standard of competence in LTW skills to qualify for certain STCW endorsements as discussed in the NPRM. The burden to mariners would not be reduced and cost savings would not be realized. This alternative would not promote compliance with international standards.
Alternative 2: Addressing Only Deck Endorsement Requirements	\$1,174,355	\$1,173,616	Remove the current requirements: Training in LMS, BRM, and demonstration of meeting the standard of competence in LTS either through training or assessments from the respective STCW deck endorsements. This alternative would promote compliance with international requirements.
Alternative 3: Addressing Only Engine Endorsement Requirements	\$4,921,842	\$4,920,634	Remove the current requirements: Training in ETSO, CSM, and HVPS from the respective STCW engine endorsements. This alternative would promote compliance with international requirements.
Alternative 4: Proposed Rule	\$6,096,197	\$6,094,250	Remove the current requirements: Training in LMS, BRM, ETSO, CSM, and HVPS from the respective STCW endorsements. Demonstration of meeting the standard of competence in LTW skills for the respective STCW endorsement. This alternative would promote compliance with international requirements.

B. Small Entities

Under the Regulatory Flexibility Act (RFA), 5 U.S.C. 601-612, we have considered whether this proposed rule would have a significant economic impact on a substantial number of small entities. The term “small entities” comprises small businesses, not-for-profit organizations that are independently owned and operated and are not dominant in their fields, and governmental jurisdictions with populations of less than 50,000 people.

This proposed rule would not impose any new costs on mariners or companies that employ mariners and would reduce the burden on mariners by removing the requirement to complete LMS, BRM, ETSO, CSM, or HVPS training, or demonstrate evidence of meeting the standard of competence in LTW skills to qualify for certain STCW endorsements. An MMC and the associated endorsements are maintained by the mariner, so mariners would receive cost savings from this proposed rule. The Coast Guard assumes the cost of attending required training and obtaining an MMC is borne by the individual obtaining the credential, making mariners the primary affected population of this proposed rule, which is estimated to be 741 mariners annually. Mariners are individuals and, as such, are not considered small entities under the RFA. We do not have further information that any companies reimburse mariners for these costs, and therefore the mariners would realize the cost savings estimated in this proposed rule.

The proposed rule does not impose any new costs or additional regulatory burdens on training providers or other small entities. Maritime training providers are invited to comment on the economic impact of this proposed rule.

Maritime training providers may qualify as small entities, as many are small businesses or not-for-profit organizations. From our analysis, we found 23 training providers offering Coast Guard-approved courses: 22 offer LMS training, 11 offer BRM training, and 2 offer ETSO training.

Based on publicly available information from the online searches of these companies, we found revenue or employee information on 21 of the 23 companies. Using the Small Business Administration's (SBA) "Table of Size Standards" and the North American Industry Classification System (NAICS) codes listed in the table, we identified 12 of the 21 companies to be small entities. We found the other 9 companies to not be small entities. We did not find information on the remaining 2 companies; therefore, we assumed these companies to be small entities for a total of 14 small entities out of 23 companies, or 61 percent.

The removal of these training requirements may result in reduced demand for the affected courses, which could lead to a minor decrease in revenue for some training providers. However, the proposed rule does not impose any new costs or additional regulatory burdens on training providers. Table 26 shows the forgone enrollment revenue for the affected training providers by this rule. LMS, BRM, and ESTO training providers would lose annually, on average, approximately \$8,944, \$2,574, and \$474,030, respectively.

Table 26: Summary of Annual Revenue Impacts Per Training Provider

	Number of Training Providers	Number of Mariners Applying for STCW	Average Number of Mariners per Training Provider	Average Tuition per Training Providers	Forgone Enrollment Revenue per Training Provider
Training	(a)	(b)*	(c)=(b)÷(a)	(d)**	(e)=(c)×(d)
LMS	22	172	8	\$1,118	\$8,944
BRM	11	25	2	\$1,287	\$2,574
ETSO	2	460	230	\$2,061	\$474,030

*Table 2

** Table 7

Based on this analysis, in Table 27, we estimated the impact on revenues for each of the small entities with available revenue information. Two-thirds (67%) of small entities with available revenue information would face a < 1% revenue loss; 25% would face between a 1 and 3% revenue loss; and 8% would face a > 3% revenue loss.

Table 27: Distribution of Revenue Impacts

Percent of Revenue Impact	Number of Small Entities with Known Revenue	Portion of Small Entities with Known Revenue
<1%	8	67%
1–3%	3	25%
>3%	1	8%

Based on available information, the Coast Guard does not anticipate that this proposed rule would have a significant economic impact on a substantial number of small entities. Therefore, the Coast Guard certifies under 5 U.S.C. 605(b) that this proposed rule would not have a significant economic impact on a substantial number of small entities. If you think that your business, organization, or governmental jurisdiction qualifies as a small entity and that this proposed rule would have a significant economic impact on it, please submit a comment to the docket at the address listed in the **ADDRESSES** section of this preamble. In your comment, explain why you think it qualifies and how and to what degree this proposed rule would economically affect it.

C. Assistance for Small Entities

Under section 213(a) of the Small Business Regulatory Enforcement Fairness Act of 1996, Public Law 104-121, we want to assist small entities in understanding this proposed rule so that they can better evaluate its effects on them and participate in the rulemaking. If the proposed rule would affect your small business, organization, or governmental jurisdiction and you have questions concerning its provisions or options for compliance, please call or email the person in the **FOR FURTHER INFORMATION CONTACT** section of this proposed rule. The Coast Guard will not retaliate against small entities that question or complain about this proposed rule or any policy or action

of the Coast Guard.

Small businesses may send comments on the actions of Federal employees who enforce, or otherwise determine compliance with, Federal regulations to the Small Business and Agriculture Regulatory Enforcement Ombudsman and the Regional Small Business Regulatory Fairness Boards. The Ombudsman evaluates these actions annually and rates each agency's responsiveness to small business. If you wish to comment on actions by employees of the Coast Guard, call 1-888-REG-FAIR (1-888-734-3247).

D. Collection of Information

This proposed rule would call for a change to an existing collection of information under the Paperwork Reduction Act of 1995, 44 U.S.C. 3501-3520. As defined in 5 CFR 1320.3(c), "collection of information" comprises reporting, recordkeeping, monitoring, posting, labeling, and other similar actions. The title and description of the information collection, a description of those who must collect the information, and an estimate of the total annual burden follow. The estimate covers the time for reviewing instructions, searching existing sources of data, gathering and maintaining the data needed, and completing and reviewing the collection.

Title: Application for Merchant Mariner Credentials and Medical Certificates.

OMB Control Number: 1625-0040.

Summary of the Collection of Information:

The Coast Guard currently collects information from applicants for an MMC under 46 CFR parts 10, 11, 12, 13, and 16, and requires that each applicant for an MMC or Medical Certificate submit an application to the Coast Guard.

The proposed rule would modify the existing reporting and recordkeeping requirements under 46 CFR 11.317(a)(3)(v) and (b)(1), 11.321(a)(3)(iv) and (b)(1), 11.329(a)(4)(v), and 12.611(a)(4), by eliminating the requirements for MMC applicants to submit certificates of completion for LMS, BRM, ETSO, CSM, and HVPS training,

and by removing the requirement to demonstrate evidence of meeting the standard of competence in LTW skills. These requirements were implemented through the 2013 final rule. In the current regulations, mariners seeking an MMC endorsement must submit an application to the Coast Guard using the CG-719B Form.

Need for Information: The collection of information is needed to verify that mariners fulfill requirements related to: (1) LMS training in §§11.317(a)(3)(v) and (b)(1); (2) BRM training in §11.321(a)(3)(iv); (3) demonstration of standard of competence in LTW skills in §11.321(b)(1); (4) ETSO training in §11.329(a)(4)(v); (5) CSM training in §12.611(a)(4)(i), and (6) HVPS training in § 12.611(a)(4)(ii) for the reasons described in **Section III., Executive Summary, C. Summary of Major Provisions.** The Coast Guard, in the proposed rulemaking, is removing the requirements for items (1) through (6) listed above. Hence it would eliminate any reporting requirements associated with those items.

Proposed Use of Information: The collection of information is intended to ensure mariners meet the regulatory requirements for issuance of certain STCW endorsements.

Description of the Respondents: The respondents are mariners applying for STCW endorsements as Masters of vessels of less than 500 GT limited to near-coastal waters, or OICNW on vessels of less than 500 GT limited to near-coastal waters, and mariners applying for STCW endorsements as OICEW in a manned engine room on vessels powered by main propulsion machinery of 750 kW/1,000 HP propulsion power or more, or ETR on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more.

Number of Respondents: According to the Coast Guard MMLD database, currently there is an annual average of approximately 741 mariners that were issued either an original STCW endorsement as Masters of vessels of less than 500 GT limited to near-coastal waters, or an original STCW endorsement as OICNW on vessels of less

than 500 GT limited to near-coastal waters, or an original STCW endorsement as OICEW in a manned engineroom on vessels powered by main propulsion machinery of 750 kW/1,000 HP propulsion power or more, over the 3-year period from 2022-2024.

The Coast Guard estimates the number of future applicants for these STCW endorsements that would need to complete LMS, ETSO, or BRM training, or demonstrate evidence of meeting the standard of competence in LTW skills based on this historical average. This proposed rule would not reduce the number of annual respondents because these mariners are still submitting an application but attaching less documentation.

Frequency of Response: The current collection of information requires respondents to submit training certificates showing completion of LMS training, BRM training, ETSO training, and standard of competence assessments when applying for their respective STCW endorsement; the Coast Guard is eliminating the need for respondents to submit these documents when applying for an MMC.

Burden of Response: This would decrease the burden for a mariner by approximately 0.083 hours (5 minutes) per application. Since there are a total of 741 documents that need to be reviewed (172 from LMS + 25 from BRM + 460 from ETSO + 84 for the demonstration of competence in LTW skills), the total reduction in burden on mariners is approximately 62 hours annually (0.083×741).

Estimate of Total Annual Burden: The existing OMB-approved total annual burden is 61,850 hours. This proposed rule would decrease the annual hour burden by approximately 62 hours to a requested amount of about 61,788 hours.

As required by 44 U.S.C. 3507(d), we will submit a copy of this proposed rule to OMB for its review of the collection of information.

We ask for public comment on the proposed collection of information to help us determine, among other things—

- How useful the information is;
- Whether the information can help us perform our functions better;
- How we can improve the quality, usefulness, and clarity of the information;
- Whether the information is readily available elsewhere;
- How accurate our estimate is of the burden of collection;
- How valid our methods are for determining the burden of collection; and
- How we can minimize the burden of collection.

If you submit comments on the collection of information, submit them to both the OMB and to the docket where indicated under **ADDRESSES**.

You need not respond to a collection of information unless it displays a currently valid control number from OMB. Before the Coast Guard could enforce the collection of information requirements in this proposed rule, OMB would need to approve the Coast Guard's request to collect this information.

E. Federalism

A rule has implications for federalism under Executive Order 13132 (Federalism) if it has a substantial direct effect on States, on the relationship between the National Government and the States, or on the distribution of power and responsibilities among the various levels of government. We have analyzed this proposed rule under Executive Order 13132 and have determined that it is consistent with the fundamental federalism principles and preemption requirements described in Executive Order 13132. Our analysis follows.

It is well settled that States may not regulate in categories reserved for regulation by the Coast Guard. It is also well settled that all of the categories covered in 46 U.S.C. Chapters 33, 37, 71, 73 and 81 (inspection, design, construction, alteration, repair, maintenance, operation, equipping, personnel qualification, and manning of vessels), as well as the reporting of casualties and any other category in which Congress intended the

Coast Guard to be the sole source of a vessel's obligations, are within the field foreclosed from regulation by the States. *See, e.g., United States v. Locke*, 529 U.S. 89 (2000) (finding that the states are foreclosed from regulating tanker vessels); *see also Ray v. Atlantic Richfield Co.*, 435 U.S. 151, 157 (1978) (state regulation is preempted where "the scheme of federal regulation may be so pervasive as to make reasonable the inference that Congress left no room for the States to supplement it [or where] the Act of Congress may touch a field in which the federal interest is so dominant that the federal system will be assumed to preclude enforcement of state laws on the same subject." (citations omitted)). Because this proposed rule involves the credentialing of merchant mariners under 46 U.S.C. Chapters 71 and 73, it relates to personnel qualifications for vessels subject to a pervasive scheme of federal regulation and is foreclosed from regulation by the States. Therefore, because the States may not regulate within this category; this proposed rule is consistent with the fundamental federalism principles and preemption requirements in Executive Order 13132.

While it is well settled that States may not regulate in categories in which Congress intended the Coast Guard to be the sole source of a vessel's obligations, the Coast Guard recognizes the key role that State and local governments may have in making regulatory determinations. Additionally, for rules with federalism implications and preemptive effect, Executive Order 13132 specifically directs agencies to consult with State and local governments during the rulemaking process. If you believe this proposed rule would have implications for federalism under Executive Order 13132, please contact the person listed in the **FOR FURTHER INFORMATION CONTACT** section of this preamble.

F. Unfunded Mandates Reform Act

The Unfunded Mandates Reform Act of 1995, 2 U.S.C. 1531-1538, requires Federal agencies to assess the effects of their discretionary regulatory actions. In

particular, the Act addresses actions that may result in the expenditure by a State, local, or tribal government, in the aggregate, or by the private sector of \$100 million (adjusted for inflation) or more in any one year. Although this proposed rule would not result in such an expenditure, we do discuss the effects of this proposed rule elsewhere in this preamble.

G. Taking of Private Property

This proposed rule would not cause a taking of private property or otherwise have taking implications under Executive Order 12630 (Governmental Actions and Interference with Constitutionally Protected Property Rights).

H. Civil Justice Reform

This proposed rule meets applicable standards in sections 3(a) and 3(b)(2) of Executive Order 12988 (Civil Justice Reform) to minimize litigation, eliminate ambiguity, and reduce burden.

I. Protection of Children

We have analyzed this proposed rule under Executive Order 13045 (Protection of Children from Environmental Health Risks and Safety Risks). This proposed rule is not an economically significant rule and would not create an environmental risk to health or risk to safety that might disproportionately affect children.

J. Indian Tribal Governments

This proposed rule does not have Tribal implications under Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments), because it would not have a substantial direct effect on one or more Indian Tribes, on the relationship between the Federal Government and Indian Tribes, or on the distribution of power and responsibilities between the Federal Government and Indian Tribes.

K. Energy Effects

We have analyzed this proposed rule under Executive Order 13211 (Actions Concerning Regulations That Significantly Affect Energy Supply, Distribution, or Use). We have determined that it is not a “significant energy action” under that order because it is not a “significant regulatory action” under Executive Order 12866 and is not likely to have a significant adverse effect on the supply, distribution, or use of energy.

L. Technical Standards

The National Technology Transfer and Advancement Act, codified as a note to 15 U.S.C. 272, directs agencies to use voluntary consensus standards in their regulatory activities unless the agency provides Congress, through OMB, with an explanation of why using these standards would be inconsistent with applicable law or otherwise impractical. Voluntary consensus standards are technical standards (for example, specifications of materials, performance, design, or operation; test methods; sampling procedures; and related management systems practices) that are developed or adopted by voluntary consensus standards bodies.

This proposed rule does not use technical standards. Therefore, we did not consider the use of voluntary consensus standards.

M. Environment

We have analyzed this NPRM under DHS Instruction Manual 023-01, Rev. 1, associated implementing instructions, and Environmental Planning Commandant Instruction 5090.1 (series), which guide the Coast Guard in complying with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 *et seq.*). We have made a preliminary determination that this action is one of a category of actions that do not individually or cumulatively significantly affect the human environment. A preliminary Record of Environmental Consideration supporting this determination is available in the docket. For instructions on locating the docket, see the **ADDRESSES** section of this preamble.

This proposed rule would be categorically excluded under paragraphs L54 and L56 of Appendix A, table 1 of DHS Instruction Manual 023-01-001-01, Rev. 1 and table 3-1 of the Coast Guard Environmental Planning Implementing Procedures 5090.1. Paragraph L54 pertains to actions that are editorial and procedural; paragraph L56 pertains to regulations concerning the training, qualifying, licensing, and disciplining of maritime personnel. This rule proposes to remove six requirements related to the STCW Convention and STCW Code. We seek any comments or information that may lead to the discovery of a significant environmental impact from this proposed action.

List of Subjects in 46 CFR Parts 11 and 12

46 CFR Part 11

Penalties, Reporting and recordkeeping requirements, Schools, Seamen

46 CFR Part 12

Penalties, Reporting and recordkeeping requirements, Seamen

For the reasons discussed in the preamble, the Coast Guard is proposing to amend 46 CFR parts 11 and 12 as follows:

PART 11—REQUIREMENTS FOR OFFICER ENDORSEMENTS

1. The authority citation for part 11 is revised to read as follows:

Authority: 31 U.S.C. 9701; 46 U.S.C. 2101, 2103, and 2110; 46 U.S.C. chapter 71; 46 U.S.C. 7502, 7505, 7701, and 70105; 46 U.S.C. chapter 89; Executive Order 10173; DHS Delegation No. 00170.1, Revision No. 01.4. Section 11.107 is also issued under the authority of 44 U.S.C. 3507.

2. Amend § 11.317 by revising paragraphs (a)(3) and (b) to read as follows:

§ 11.317 Requirements to qualify for an STCW endorsement as Master of vessels of less than 500 GT limited to near-coastal waters (management level).

(a) * * *

(3) Provide evidence of having satisfactorily completed approved training in the following subject areas:

(i) Medical First-aid Provider.

(ii) Basic and Advanced Firefighting in accordance with § 11.303.

(iii) Proficiency in Survival Craft and Rescue Boats other than Fast Rescue Boats (PSC) or Proficiency in Survival Craft and Rescue Boats other than Lifeboats and Fast Rescue Boats (PSC-Limited).

(iv) ECDIS, if serving on a vessel with this equipment.

(v) Radar Observer, if serving on a vessel with this equipment.

(vi) ARPA, if serving on a vessel with this equipment.

(b) For a renewal of an STCW endorsement as Master of vessels of less than 500 GT limited to near-coastal waters, each candidate must provide evidence of successful completion of approved training in ECDIS, if serving on a vessel with this equipment.

* * * * *

3. Amend § 11.321 by revising paragraphs (a)(3) and (b) to read as follows:

§ 11.321 Requirements to qualify for an STCW endorsement as Officer in Charge of a Navigational Watch of vessels of less than 500 GT limited to near-coastal waters (operational level).

(a) * * *

(3) Provide evidence of having satisfactorily completed approved training in the following subject areas:

(i) Medical First-aid Provider.

(ii) Basic and Advanced Firefighting in accordance with § 11.303.

(iii) Proficiency in Survival Craft and Rescue Boats other than Fast Rescue Boats (PSC) or Proficiency in Survival Craft and Rescue Boats other than Lifeboats and Fast Rescue Boats (PSC-Limited).

(iv) ECDIS, if serving on a vessel with this equipment.

(v) Radar Observer, if serving on a vessel with this equipment.

(vi) ARPA, if serving on a vessel with this equipment.

(b) For a renewal of an STCW endorsement as OICNW of vessels of less than 500 GT limited to near-coastal waters, each candidate must provide evidence of having satisfactorily completed approved training in ECDIS, if serving on a vessel with this equipment.

* * * * *

§ 11.329 [Amended]

4. Amend § 11.329 by:

a. Removing paragraph (a)(4)(v); and

b. Redesignating paragraphs (a)(4)(vi) through (xi) as paragraphs (a)(4)(v)

through (x).

PART 12—REQUIREMENTS FOR RATING ENDORSEMENTS

5. The authority citation for part 12 continues to read as follows:

Authority: 31 U.S.C. 9701; 46 U.S.C. 2101, 2103, 2110, 7301, 7302, 7503, 7505, 7701, and 70105; DHS Delegation No. 00170.1, Revision No. 01.4.

6. Amend § 12.611 by revising paragraphs (a)(2)(iii), and (a)(3), and (b) to read as follows:

§ 12.611 Requirements to qualify for an STCW endorsement as Electro-technical Rating on vessels powered by main propulsion machinery of 750 kW/1,000 HP or more.

(a) * * *

(2) * * *

(iii) Qualifications meeting the standard of competence specified in Table A-III/7 of the STCW Code (incorporated by reference, see §12.103 of this part) and approved seagoing service of not less than 3 months; and

(3) Provide evidence of meeting the standard of competence specified in Table A-III/7 of the STCW Code.

(b) An applicant who holds an STCW endorsement as Able Seafarer-Engine and a national rating endorsement as Electrician, Electrician/Refrigerating Engineer, or Junior Engineer will be issued the ETR endorsement upon completion of the requirements in Section A-III/7 of the STCW Code.* * * * *

Dated: September 28, 2026.

R.C. Compher,
Rear Admiral, U.S. Coast Guard,
Assistant Commandant for Prevention Policy.
[FR Doc. 2026-20087 Filed: 9/30/2026 8:45 am; Publication Date: 10/1/2026]