Loss Prevention Bulletin

Ship Type: All Trade Area: USA

Bulletin 110 - 9/99 - Y2K Readiness - USCG Requirements

Since the end of August 1999, the US Coast Guard have been asking to see details of ships' Y2K contingency plans whilst conducting onboard PSC inspections. The results of equipment investigations and tests have also been required and inquiries have been made of key personnel to ensure they are familiar with their own Y2K contingency plan duties. This is in addition to the requirement that Y2K readiness questionnaires must be filed with the Coast Guard ahead of a ship's arrival in US waters.

At the beginning of this month a number of ships were detained and delayed as the Coast Guard made its checks on ships moving around the 9/9/99 risk period. This was because the ships failed to meet the requirements for filing readiness questionnaires or failed to have an operational contingency plan in place. The remaining peak risk periods, that have been designated as such by the Coastguard, are 31st December 1999 through 1st January 2000 and 28th Febuary 2000 through 29th Febuary 2000. Similar detentions and delays may be anticipated around those times as well.

The Coast Guard's requirement for submitting readiness questionnaires can be analysed in two parts:

- (a) Ships operating in US waters during peak risk periods
- (b) Ships operating in US waters until 31st March 2000 but not during any of the peak risk periods.
- (a) Ships reporting under (a) are required to complete and submit an IMO Questionnaire 2 form **and** a US Supplement form (found at www.uscg.mil/hq/g-m/y2kweb/startup.htm). A separate US Supplement form must be filled in for each ship. If the answers to the questions in the IMO Questionnaire 2 form are the same for each ship in the fleet, only one need be completed and submitted. If the answers to the questions in the IMO Questionnaire 2 differ between the ships in the fleet, separate forms must be completed for ships that generate different answers. Ships reporting under (b) need only complete US Supplement forms. Again one form must be submitted for each ship in the fleet. If a ship's Y2K readiness status changes or the contingency plans relating to the ship are altered, the Coast Guard requires the questionnaires to be completed afresh and re-submitted. The questionnaires can be submitted to the Coast Guard by mail, by fax (+1-877-825-4357 for reporting from within the US and +1-703-522-1839 for reporting from outside the US) or on-line via the Coast Guard's website.
- (b) For ships scheduled to enter or leave port at peak risk periods, the port's Vessel Traffic Service may be expected to inquire whether or not basic safety measures, such as the following, have been implemented onboard:

Propulsion machinery under the direct, manual supervision of a senior engineering officer (particularly for ships operating with reduced engineering watches by reason of automated systems allowing minimally attended or periodically unattended machinery plant operation).

Propulsion machinery tested in the ahead and the astern conditions immediately prior to entering the 12 mile limit.

Steering gear room manned and emergency steering control tested immediately prior to entering the 12 mile limit. (If the engine room is adjacent to the steering gear room, the manning the steering gear room is not required, however a test of emergency steering control should definitely be conducted).

A minimum of two navigation officers on the bridge of ships with automated navigation systems such as ARPA or autopilot. (The autopilot should be disengaged and should not be used during peak risk periods).

Anchor detail on standby so that the master can be sure that no delay would be encountered letting-go anchors if necessary.

Towlines rigged fore and aft and ready for immediate use.

The Captain of the Port will adopt a 'low-score-wins' points system to determine a ship's risk factor according to the following scale:

1-15	points	Green	Ship may enter without delay
16-55	points	Yellow	Ship may enter upon further review
56+	points	Red	Ship will be denied entry

A ship will also be denied entry if, during one of the peak risk periods, it seeks to enter US waters but has not completed and submitted the readiness reporting forms. The deadline for submitting the Y2K readiness reporting questionnaires for US ships was August 20, 1999 and therefore has already passed. For non-US ships entering US waters the deadline is 24 hours before arrival but we must recommend that the reports are submitted as soon as conveniently possible so that the information can be collected and processed into the holding database in good time.

Information: USCG website and Thomas Miller Americas Inc