

GMDSS TASK FORCE INFORMATION BULLETIN

TONNAGE INTERPRETATIONS FOR GMDSS APPLICATION

This information bulletin provides a brief discussion of vessel tonnage measurement schemes and the means of determining a vessel's status relative to participation in the Global Maritime Distress and Safety System (GMDSS) based on tonnage.

General GMDSS Applicability

Effective 1 February 1999 U.S. commercial vessels of 300 gross tons and upward have been required to participate in the GMDSS by installing required equipment and carrying certified GMDSS radio operators. GMDSS applies to vessels on international voyages and on domestic voyages offshore, but not to vessels on voyages limited to inland waters and the Great Lakes. Small U.S. passenger vessels operated solely on domestic voyages are not required to participate in the GMDSS, but have separate radio requirements under the FCC rules.

Regulatory vs. Convention Tonnages

Gross tonnage is a volumetric measure of the overall size of a vessel. U.S. statutes provide for vessel measurement under two overarching systems: the newer, internationally-based Convention Measurement System and the older, historically-based Regulatory Measurement System. The Convention system applies only to vessels that are 79 feet and over in length. Gross tonnage assigned under the Convention system is expressed in terms of gross tonnage ITC (GT ITC, or simply GT). Gross tonnage assigned under the Regulatory system is expressed in terms of gross register tonnage (GRT).

Use of Regulatory Tonnage for GMDSS

Under U.S. law, newer vessels and vessels on foreign voyages must be measured under the Convention system. Because gross tonnage under this system often exceeds tonnage measured under the Regulatory system, owners may opt to have their vessels measured under the Regulatory system for purposes of applying certain laws in effect prior to 18 July 1994. GMDSS rules are part of the revised treaty on the Safety of Life at Sea (SOLAS), and the implementing U.S. statutes for GMDSS fall into this "grandfathered" category. Therefore, GRT tonnage may be used by the owner of any U.S. flag vessel engaged on a domestic voyage to determine the applicability of GMDSS requirements. For foreign voyages, certain categories of older vessels that have not been substantially altered are similarly entitled to use GRT tonnage to determine the applicability of GMDSS requirements, since the associated tonnage threshold in SOLAS predates the full coming into force of the 1969 Tonnage Convention on 18 July 1982. However, GMDSS rules are applied for newer vessels (and older vessels that have undergone substantial alterations) using GT ITC tonnage while engaged on a foreign voyage. For vessels less than 79 feet in length, regardless of voyage type, GRT tonnage is used to determine GMDSS applicability.

Determining Tonnage for GMDSS Applicability

Under International Maritime Organization (IMO) Resolution A.1073(28), adopted on 4 December 2013, a vessel's International Tonnage Certificate (1969) will include appropriate remarks if the vessel is eligible for GRT grandfathering. Further, if the vessel is additionally issued a SOLAS Ship Safety Certificate, the Safety Certificate will include an appropriate grandfathering remark that cross-references the International Tonnage Certificate (1969). For vessels lacking such remarks on their certificates, including those that predate the IMO Resolution and predecessor IMO guidance, the combination of U.S. and International Tonnage Certificates (1969) provides sufficient information to allow an assessment of GRT grandfathering eligibility based on the keel laid/substantially altered date.

For Additional Information

The U.S. tonnage measurement program is administered by the Coast Guard Marine Safety Center's Tonnage Division (MSC-4), which oversees the performance of tonnage measurement of commercial vessels on the Coast Guard's behalf by authorized measurement organizations. Information on application of tonnage measurement systems and use of GRT for tonnage thresholds can be found in § 69.11 and § 69.20 of the Tonnage Regulations (46 Code of Federal Regulations), as well as the Coast Guard's Navigation and Vessel Inspection Circular (NVIC) 11-93 (series), *Applicability of Tonnage Measurement Systems to U.S. Flag Vessels*. As of 2020, this NVIC is being reviewed for replacement with a functionally similar document published by the Marine Safety Center. Contact information for both the Tonnage Division and the authorized measurement organizations is available on the Marine Safety Center's website, www.dco.uscg.mil/msc.

The GMDSS Task Force

This Information Bulletin was initially approved on 14 October 1997, and most recently updated on 14 May 2020 by the GMDSS Task Force, a U.S. Coast Guard sponsored group established to coordinate implementation problems, recommend their resolution, and disseminate GMDSS information.