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July 25, 2001

Mr. Robin M. Bradley
Permanent Secretariat
International Association of Classification Societies
5 Old Queen Street
London SW1H 9JA, England
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Dear Mr. Bradley,

In response to your letter of 18 July 2001, I have enclosed a Commonwealth of Dominica Marine Safety Circular on life saving appliances. It addresses inflatable life raft approval and servicing.

The Commonwealth of Dominica International Maritime Act, 2000, Chapter 1, Part III – Vessel Inspection SOLAS '74, as amended, Chapter III, SOLAS Consolidated Edition 1997, IMO Resolution A.689 (17) dated 6 November 1991 and IMO Resolution A.761 (18) dated 17 November 1993 are our basic requirements.

Safety equipment and other materials or equipment and any associated required servicing approved under an accepted IMO standard by a major maritime authority, such as the USCG, UK MSA and the Ministries of Transport or Maritime Directorates of Japan, France, Italy, Germany, Norway, Korea, China, Russian Federation, Canada, Australia, or by an IACS member on behalf of a national maritime authority are acceptable for vessels registered with the Commonwealth of Dominica. Where such arrangements are not in place we would expect that RO's authorized by Dominica would perform the applicable approval function on our behalf.

Where a facility is approved by a flag State and is authorized by the manufacturer, direct involvement of an RO at the service facility is not required. For example, liferaft servicing stations approved by the US Coast Guard and that are authorized by the manufacturer of the raft being serviced are permitted to service liferafts for Dominica ships which are attended by recognized organizations (ROs) acting on our behalf.

Owners are required to select a service station that meets the requirements of IMO Resolution A.761 (18). It is noted that this assures that the fundamental requirement of each Administration to require that the service stations be authorized by the manufacturer.

This acceptance presumes that the service station operate in all respects within the constraints specified by the raft manufacturer and the flag State approval requirements. Additionally, it assumes that all official documentation for such approvals and manufacturer acceptances are current and valid.

If suitable service stations are not available at the port of survey, extension of the applicable statutory Certificate may be authorized by the Office of the Deputy Maritime Administrator upon reasonable request to allow up to 17 months from the last date of service for the required service to be completed.

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It is encouraging to note in your letter that IACS societies "will endeavour to avoid/minimize the making of multiple overtures by different societies to approve the same station by more than one of your ROs." Mutual recognition of approvals among IACS societies is a welcome development.

Sincerely,



Eric R. Dawicki

Deputy Maritime Administrator for Maritime Affairs

Enclosures