



MARINE
CFO 

TECHNICAL MANUAL

Towing Vessel Record



Towing Vessel Record Technical Manual

This Technical Manual has been developed for use by mariners, towing vessel owners & operators, safety providers, repair yards, surveyors, and auditors regulated under 46 CFR SubChapter M (Towing Vessels). It is a recordkeeping tool which satisfies the onboard documentation requirements of SubChapter M. Although this Technical Manual derives primary content from 46 CFR 136-144 the reader should not consider the Technical Manual either definitive or authoritative. Final authority and interpretation of 46 CFR 136-144 rests with the United States Coast Guard and the Federal Courts.

For ease of reading the Towing Vessel Record Technical Manual is broken into nine principal sections: Introduction, Required Entries, eLogs /CEMS/ Oil Log, Assessments, Preventative Maintenance, Reports, Document Management, Vessel 365, and Penalties. The reader is advised to read the sections consecutively for quickest mastery of the content.

Introduction

The central element of a Towing Vessel Record is the USCG concept of “**objective evidence**” which means records, documents, or data that confirm the existence, implementation, and continuing maintenance of a Towing Safety Management System (TSMS) and a Safety Management System (SMS).

The **Towing Vessel Record** is defined in 46 CFR 136.110, 140.910, and 140.915 as an electronic or manual recordkeeping processes which is the objective evidence of the chronological events, assessments, inspections, examinations, and crew records of a towing vessel.

The **Towing Vessel Record** is required of all towing vessels electing the USCG prescriptive safety solution.

The **Towing Vessel Record** can be considered an element of the larger “**System of Recordkeeping**” that is maintained to verify continuing maintenance of a TSMS or SMS.

Required Towing Vessel Record Entries

Vessel Activities:	46 CFR 140.910(c)
Personnel Records:	46 CFR 140.400
Safety Orientation:	46 CFR 140.410
Drills & Training:	46 CFR 140.420
Examination & Test:	46 CFR 140.615
Navigation Safety Equipment:	46 CFR 140.620
Navigation Assessments:	46 CFR 140.635
Navigation Safety Training:	46 CFR 140.645
Oil Residue Discharge/Disposal:	46 CFR 140.655
Towing Gear Inspection:	46 CFR 140.820
Fire System Inspection:	46 CFR 142.240
Correction & Preservation:	46 CFR 140.915
<i>(required recordkeeping function)</i>	

eLogs, CEMS, & Oil Log

An eLog blends the Vessel Activity requirement, portions of the Personnel Records (CEMS) requirement, and Oil Log into a record of chronological events. Vessel movements, cargo activities, and special evolutions are maintained per Image 1. The correction and preservation requirement can be seen in Image 2.

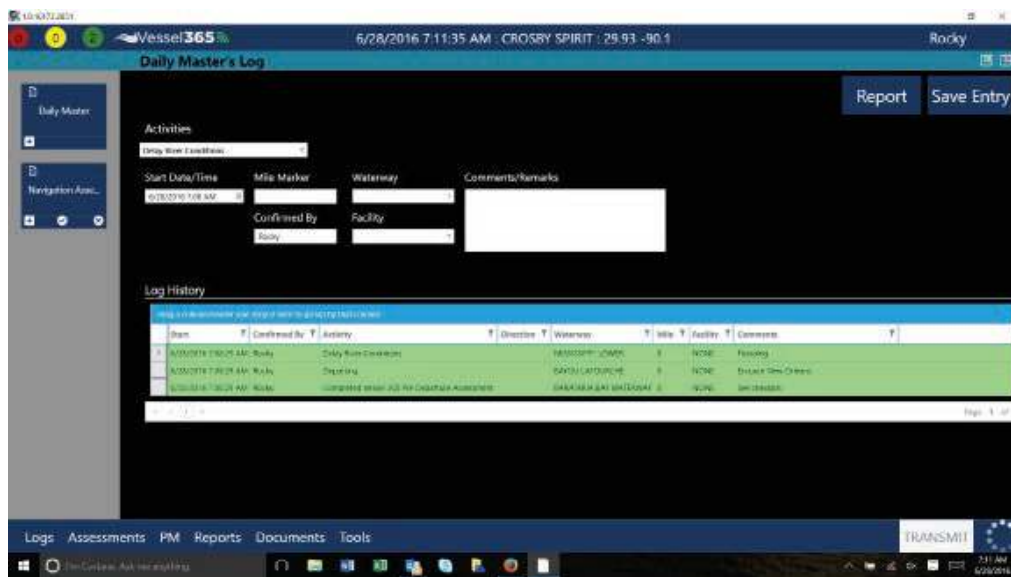


Image 1

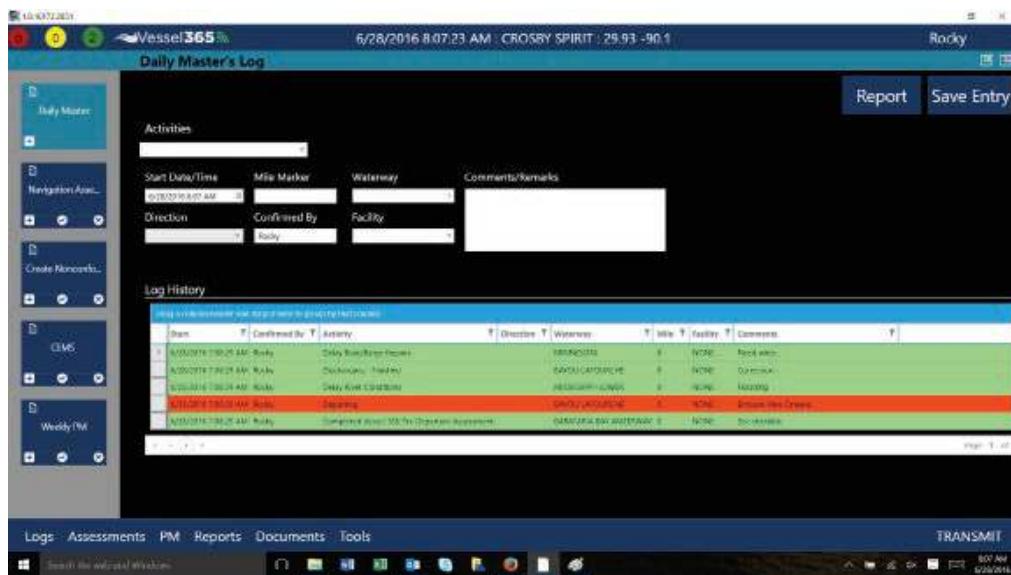


Image 2

eLogs, CEMS, & Oil Log (continued)

A record of crew working hours (CEMS) and the Oil Log can be seen in Images 3 & 4.

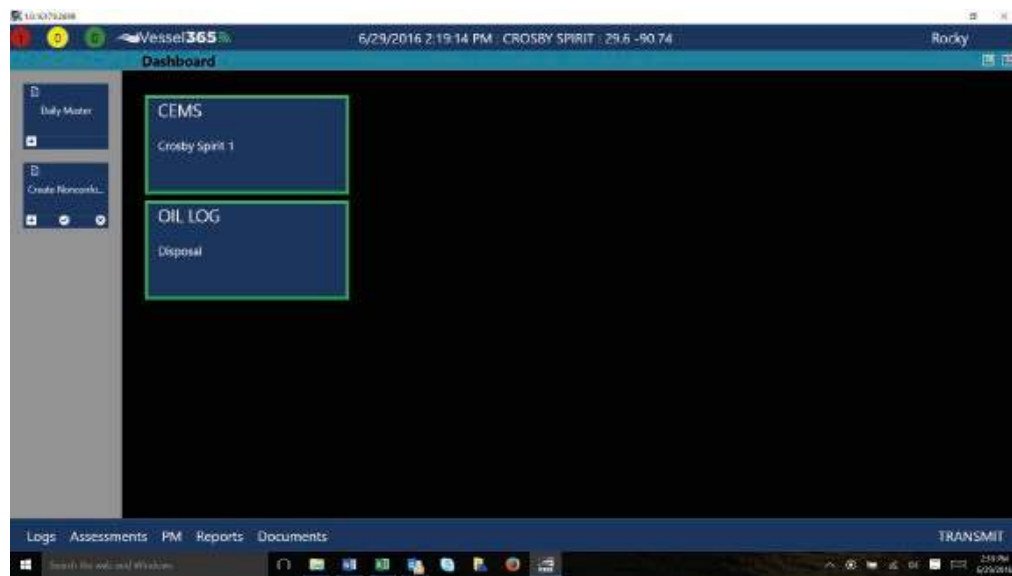


Image 3

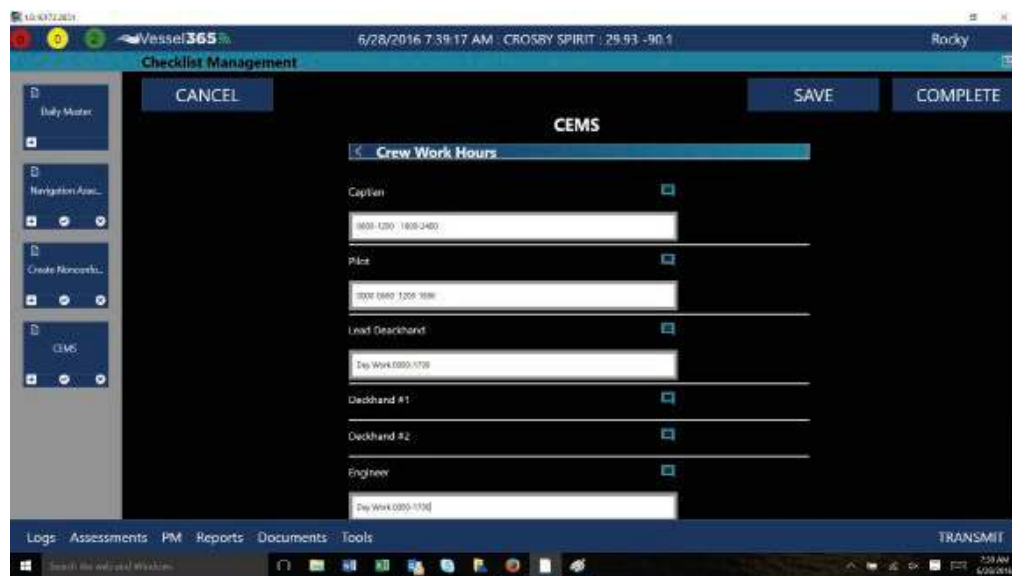


Image 4

Assessments

The Assessment function includes Safety Orientation, Towing Gear Inspections, Navigation Assessments, Navigation Safety Training, and Pre-Departure Assessments as seen in images 5 & 6.

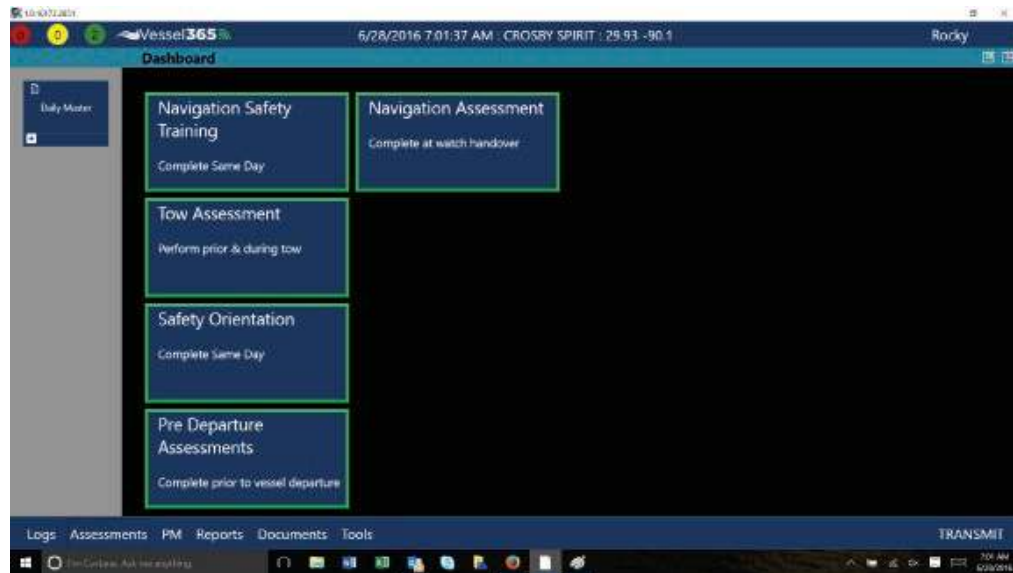


Image 5

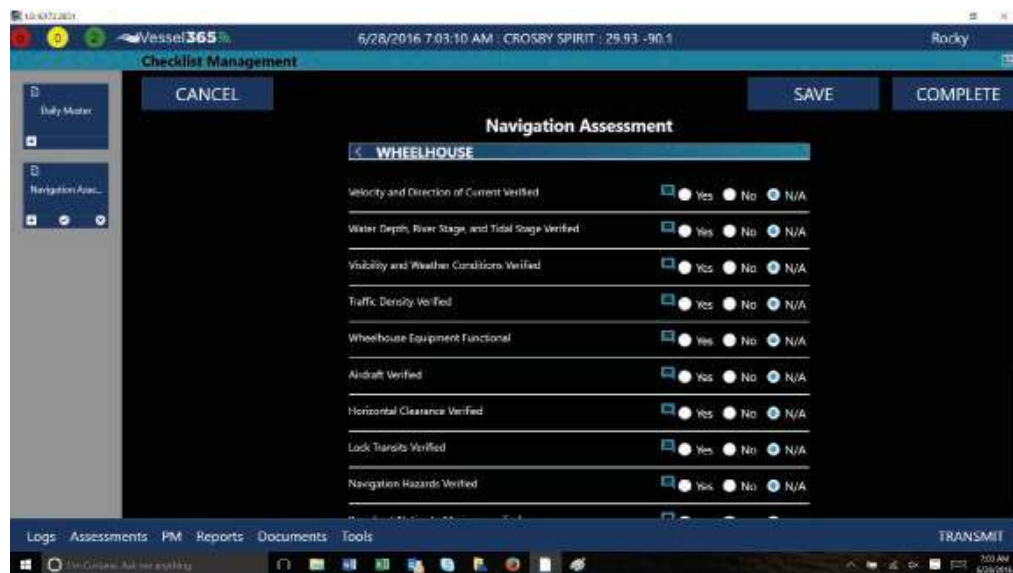


Image 6

Preventative Maintenance

The Preventative Maintenance function, which includes the Fire System inspection, provides for critical, essential, and non-critical machinery, systems, and arrangement inspections. Image 7 displays a default Preventative Maintenance model while Image 8 displays an initial nonconformity report.

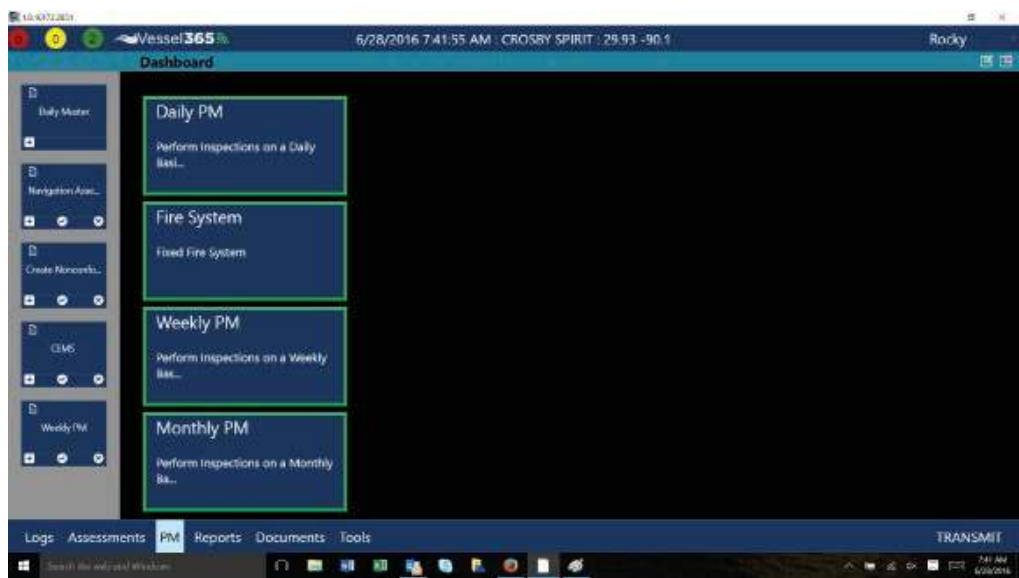


Image 7



Image 8

Reports

Reporting functions are comprised of Assessment & PM Histories, Nonconformity & Deficiency Histories, Nonconformity & Deficiency Reports, Drill & Training Reports, Task Creation, and Workorder Creation. Image 9 displays the Report tiles and Image 10 displays a Nonconformity Report.

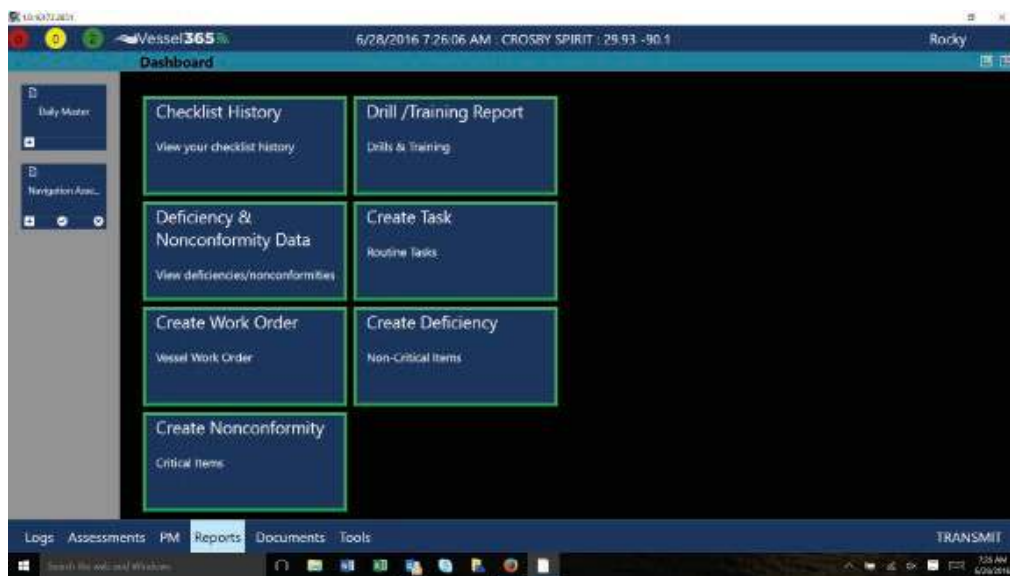


Image 9

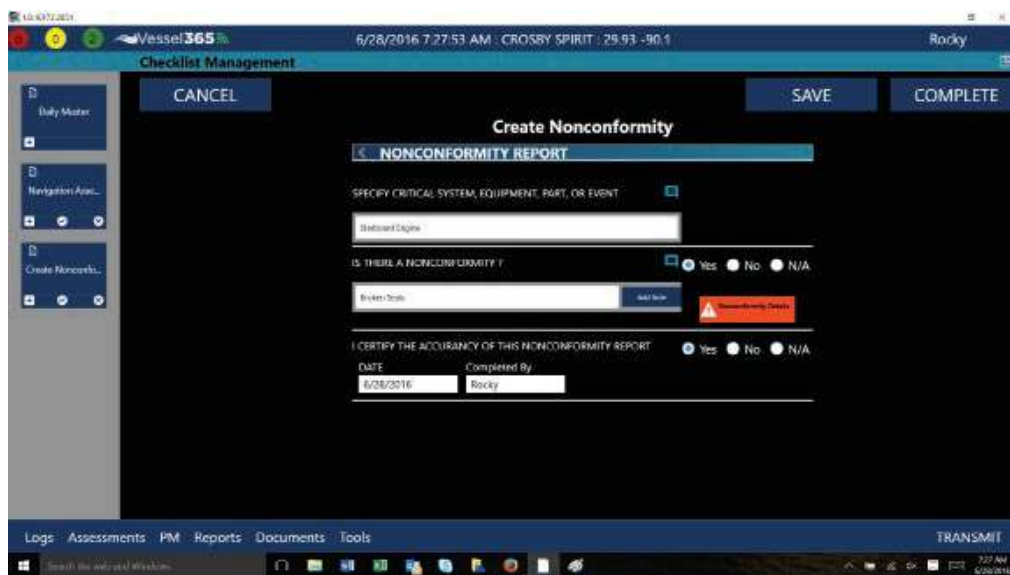


Image 10

Document Management

Document Management is a traditional folder tree repository for various forms, documents, logs, and templates which may be read only, interactive, or scheduled documents. Image 11 displays the Folder Tree and Image 12 displays a sample interactive document.

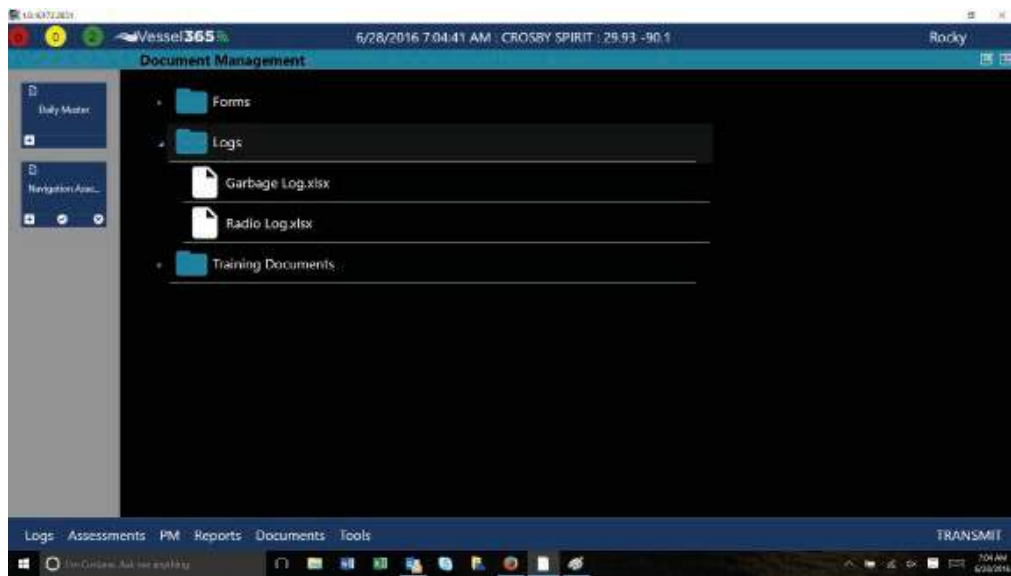


Image 11

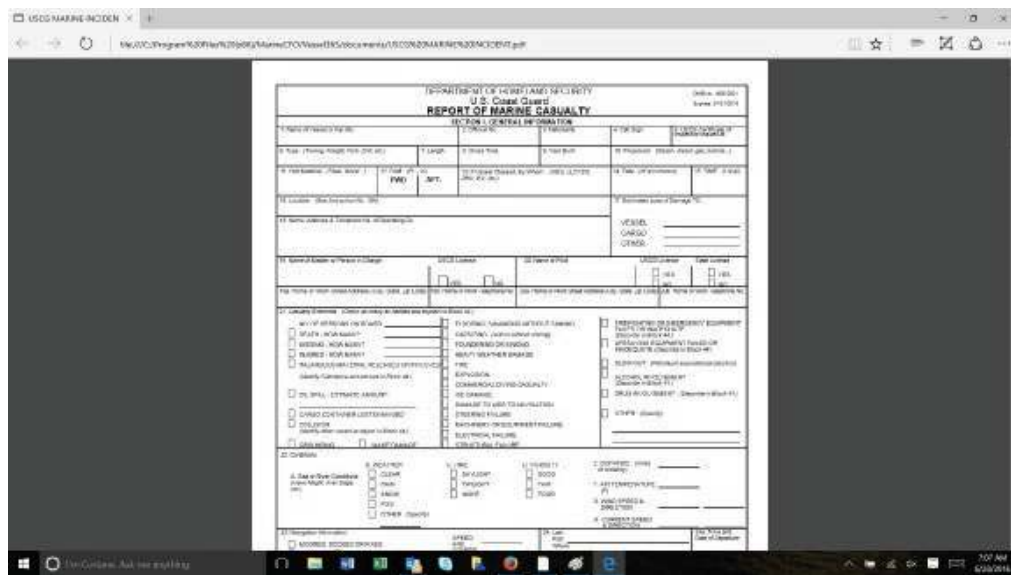


Image 12

Vessel 365 Standards

Vessel 365 #1: Exceeds all SubChapter M Recordkeeping Elements, Prime Standards, and Detailed Standards.

Vessel 365 #2: The **Towing Vessel On Boarding Wizard** quickly formats the vessel User Interface to SubChapter M Elements & Standards but permits for editing to meet each vessel's unique operational footprint.

Vessel 365 #3: Towing Vessel **Document Management System** provides a fully interactive folder solution that allows for resources documents, templates, and the reoccurrence of scheduled of templates. Native document formats supported.

Vessel 365 #4: Towing Vessel **Activity Log** provides full range of regulatory and commercial logging functions with "strike out" and "correction" feature.

Vessel 365 #5: The Assessment & Non-conformity process is "cradle to grave" and fully interfaced with shoreside staff.

Vessel 365 #6: A **Preventative Maintenance** feature which meets 46 CFR 138.220(c)(1) requirements for audit, survey, and daily operations.

Vessel 365 #7: Full shoreside solution includes Fleet Communication Console, Dedicated Compliance Console, Checklist Configurator, Vessel Configurator, Notifications Feature, & Document Management Console.

Vessel 365 #8: Expansion & 3rd Party integration capabilities with Dry Dock, Conditioned Based Maintenance, Human Resources, Accounting, Dispatch through **MarineCFO Enterprise**.

SubChapter M Recordkeeping Ready in 60 Minutes

STEP 1: Download the free **Guidebook to SubChapter M Recordkeeping** (1 minute)

STEP 2: Read the Guidebook (10 minutes)

STEP 3: Evaluate existing recordkeeping against the Guidebook (10 minutes)

STEP 4: Subscribe to **Vessel 365 by MarineCFO** (5 minutes)

STEP 5: Use the **On Boarding Wizard** to configure office & fleet (10 minutes)

STEP 6: Install the Vessel 365 app on each tug's computer (4 minutes per vessel)

STEP 7: Train workboat crew to operate Vessel 365 (10 minutes per vessel)

STEP 8: Evaluate the Vessel 365 recordkeeping against the Guidebook (10 minutes)

Important Information

The 8 Step Office & Fleet Accelerator is intended to configure Vessel 365 for rapid shoreside and fleet deployment through of series of default assessment, planned maintenance, logging, and document management settings. Although these default settings exceed the standards for SubChapter M recordkeeping it is recommended that subscribers modify these default settings after setup to more closely align with their TSMS, RCP, or ISM recordkeeping requirements. Subscribers adopting Vessel 365 as a Towing Vessel Record per the USCG Option should refer to 46 CFR 140.910 & 46 CFR 140.915 for default setting enhancements. Additional setup time may be required for any modifications to the default settings during initial provisioning.

Penalties

SubChapter M sanctions are consistent with penalties for other SubChapters:

18 USC 1001 (Criminal)
33 CFR 27.1 (Civil)

Typical single instance recordkeeping fines escalate from \$300 per entry or event. Criminal penalties for recordkeeping infractions include no more than 5 years imprisonment per instance.



Vessel 365 is a new generation fleet optimization technology engineered by MarineCFO.

This cutting edge onboard application bundles eLogs, Safety Assessments, Planned Maintenance, Notifications, & Document Management into an easy to use and highly configurable vessel/shore replication system.

Visit us online for more information at www.vessel365.com
We can be reached by phone at 1 (866) 9MARINE

About MarineCFO

Headquartered in Houma, LA, MarineCFO is the brand of VerticalLive (formerly Advanced Software Development) which has been offering marine specific operational and business solutions since 1997. Originally conceived as an "add on" to ASD's widely renowned UA Business Software, the MarineCFO suite was commercialized in 2002. MarineCFO was incorporated in 2007 as a wholly owned subsidiary of ASD and in 2009 launched the first workboat smart client application. MarineCFO was purchased in 2013 as part of the widely publicized acquisition of ASD by VerticalLive. A reimagined MarineCFO emerged from strategic restructuring in 2015 as a leading expert in workboat compliance solutions and specifically SubChapter M. Through a network of respected maritime teaming partners, such as Lloyd's Register and Tug & Barge Solutions, MarineCFO is poised as the trusted technology partner in the workboat industry.