

U.S. Department
of Transportation

United States
Coast Guard



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OCTOBER 4, 1995

Major Larry G. Rhinehart
State Boating Law Administrator
Department of Natural Resources
402 W Washington Street Room W-255D
Indianapolis IN 46204

Dear Major Rhinehart:

Thank you for your facsimile of September 14, 1995, asking how the Coast Guard and the States should regulate water vehicles such as the "Shuttle Craft," which are powered by Personal Watercraft (PWC), as opposed to conventional inboard engines, outboard motors or sterndrive units.

Members of my staff who attended the International Marine Trades Exhibit and Convention (IMTEC) in Chicago, Illinois in September of 1994 examined a similar product being marketed under the trade name "Windjet." Enclosed you will find copies of our correspondence with the manufacturer and the reply we received.

What follows are answers to some of the obvious questions that might be raised about such products.

Question: How should States treat water vehicles which are powered by PWC?

Answer: Water vehicles such as the "Shuttle Craft" and "Windjet" should be treated as conventional powered boats. They are designed primarily for propulsion by a motor -- in this case one or two PWC. A vessel propelled by a motor is a conventional boat. Purchasers do not use such vessels as unpowered rafts.

Question: Do they have Hull Identification Numbers (HINS)?

Answer: Yes.

Question: Should they have HINS?

Answer: Yes.

Question: When does such a product become a vessel?

Answer: The statutes define the term, "vessel," as including "every description of watercraft (other than a seaplane on the water) used or capable of being used as a means of transportation on the water." The manufacturers of the

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"Shuttle Craft" and "Windjet" have designed them with the intent that they be used as a means of transportation on the water.

Question: Do they have/need a U.S. Coast Guard Maximum Capacities label?

Answer: Based on the response from the builder of the "Windjet," the manufacturer made every effort to comply with all applicable safety standards in 33 CFR 183 and NMMA requirements. The manufacturer of the "Shuttle Craft" has a Manufacturer Identification Code (QSZ) and the brochure faxed to us bears the NMMA logo. We'll write the manufacturer to verify compliance; however, the "Shuttlecraft" probably also complies with applicable safety standards.

Question: Are such vessels boats for Boating Accident Reporting purposes?

Answer: Yes.

Since the "Shuttlecraft" and "Windjet" are designed primarily for propulsion by a motor, they should have their own State registration numbers, because the features of the connected vessel(s) would differ from those of the PWC(s) when the vessels are in tandem and the registration number(s) on mated PWC(s) would not be visible.

According to Rick Gipe of my staff, the above interpretations agree with the findings of last week's Numbering and Titling Workshop at the NASBLA meeting in Las Vegas, Nevada.

Sincerely,

J. A. STIMATZ
Chief, Auxiliary, Boating, and
Consumer Affairs Division
By direction of the Commandant

Enclosures

Copy to: Mr. Ed Carter