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22 AUG 2023
CG-BSX-23 Policy Letter 23-02

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To: Distribution

Subj: COMPLIANCE GUIDANCE FOR HULL IDENTIFICATION NUMBERS (HINs)

Ref: (a) Title 33 Code of Federal Regulations Part 181
(b) Title 33 Code of Federal Regulations Part 174
(c) Title 46 U.S. Code Chapter 43
(d) Title 33 Code of Federal Regulations Part 183
(e) NASBLA HIN Validation & Verification Guideline PPT
(f) USCG BSX Policy Letter 22-02, CH-1 "Change 1 to Requirements for Mechanically Propelled Personal Hydrofoils (Efoils) and Mechanically Propelled Surfboards (Jetboards)"
(g) USCG BSX Policy Letter 23-01 "Manufacturer's Identification Codes"
(h) USCG Memo "Vessels Powered by Personal Watercraft" dtd 5 Jul 2019

1. Purpose. This policy provides guidance to state issuing authorities, recreational vessel manufacturers and law enforcement officers on all aspects of recreational vessel hull identification numbers (HINs), including what vessels require HINs, HIN format, and state assigned HINs.
2. Directives Affected. This policy supersedes CG-BSX-2 Policy # 2020-1, Implementation of Title 33 CFR §174.16, Verification of Hull Identification Number (HIN), and CG-BSX-2 HIN Letter dated 9 OCT 2020.
3. Action. USCG headquarters units and offices and districts and sector commanders, state issuing authorities, recreational vessel manufacturers, and the public shall use this policy to ensure compliance with U.S. statutory and regulatory requirements.
4. Background. Any recreational vessel manufactured in or imported to the United States for sale is required to display a unique 12-character HIN and must comply with the applicable requirements of ref. (a). Ref. (b) requires state issuing authorities to determine whether a vessel has a primary HIN meeting the requirements of ref. (a) prior to taking any action on the vessel, and, in the absence of a HIN, the state must assign a primary HIN to the vessel and verify that the owner of the vessel has permanently affixed the assigned primary HIN to the vessel in compliance with ref. (a)
5. Discussion. The main purpose of a HIN is to be able to identify vessels that may not comply with recreational vessel safety regulations found in ref. (a) and (c). As a result, in accordance

with ref. (a), HINs must only be affixed to vessels built to the requirements of recreational vessel safety regulations. Therefore, the requirement to verify HINs found in ref. (b) is only applicable to recreational vessels, not all state-numbered vessels. The paragraphs below contain guidance on HIN formats, HIN verification, state assigned HINs and other situations that raise questions about HINs.

6. **Manufacturers Identification Code (MIC).** MICs are a three-character code that form the first three characters of a HIN. The U.S. Coast Guard has a separate comprehensive policy on MICs, but because they are a required part of HINs, please be aware of the following:
 - a. USCG MIC policy can be found in ref. (g) at <https://safeafloat.com/policies-letters/>.
 - b. MIC records can be viewed at <https://uscgboating.org/content/manufacturers-identification.php>.
 - c. MICs are currently assigned as all letters, but in the past some MICs have included numbers. Examples include “4WN” for some Four Winns boats and “MB2” for Malibu Boats.
 - d. The USCG and Transport Canada have an agreement to allow Canada to assign MICs to Canadian manufacturers using the same pool of available MICs that the USCG uses. MICs starting with the letters “Q”, “Y” and “Z” are currently reserved for Canadian manufacturers; however, U.S. manufacturers or importers were previously issued MICs starting with “Q”, “Y” or “Z” that are still in use today.
 - e. Foreign manufacturers **must** use a U.S. importer. The U.S. importer must have their own Coast Guard-issued MIC.
 - f. To apply for a MIC, send an email to micapp@uscg.mil.

7. **Original HIN Formats.** Prior to November 1, 1972, recreational vessels were not required to have HINs. The original HIN requirement was adopted on November 1, 1972, and had two distinct format options:

a. **Straight Year**

MIC	Serial #	Month of Certification or Manufacture	Year of Certification or Manufacture
ABC	123XY	08	83

b. **Model Year**

MIC	Serial #	Model Year Format Designator	Model Year	Month of Certification or Manufacture
ABC	123XY	M	83	A

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In the example of the Model Year Format above, the letters “A” through “L” were issued for the 12th character based on the month the vessel was certified or manufactured with “A” indicating August sequentially through “L” indicating July.

NOTE: The Straight Year and Model Year HIN formats are valid HINs if they were affixed to the vessel prior to their discontinuation on August 1, 1984. On September 9, 1983, the USCG promulgated a Final Rule changing the HIN format. This rule created the “Current Format,” which replaced the Straight Year and Model Year formats. The Current Format was allowed beginning January 1, 1984, and became mandatory on August 1, 1984.

8. Current Format. All new manufacturer-assigned HINs affixed after August 1, 1984 must follow the Current Format. The Current Format in ref. (a) specifies the following:
 - a. Characters 1-3 represent the MIC, which is assigned by the Office of Auxiliary and Boating Safety to manufacturers and importers.
 - b. Characters 4-8 represent the serial number and may be any combination of letters and numbers the manufacturer or importer chooses with exception of the letters “I”, “O”, or “Q” due to their resemblance to the numbers “1” and “0”.
 - c. Characters 9-10 represent the date of certification or manufacture, whichever applies. Character 9 represents the month and is designated by letters “A” through “L”, which correspond to January through December, respectively (i.e., “A” represents January, “L” represents December, and the ten months in between are represented sequentially by the letters “B” through “K”). Character 10 represents the year and is denoted by the last numeral of the calendar year in which the vessel was manufactured or certified.
 - d. Characters 11-12 represent the model year and are denoted by the last two numerals of the model year (e.g., a 2018 model year vessel would be represented as 18 in the last two characters of the HIN).

Country Code	MIC	Production or Serial #	Date of Certification or Manufacture	Model Year
US	ABC	123XY	H2	23

NOTE: Country codes are not required and are only discussed in 33 CFR 181.27. This section addresses the use of “US-“ to allow for US manufacturers to use for exportation to other countries. However, some vessels with a US country code are sold in the US. The “US-“ country code preceding a HIN is authorized as long as the MIC was issued to a US-based manufacturer or importer and corresponds with the vessel and the vessel’s supporting documentation such as a Manufacturer’s Statement of Origin (MSO) and/or a Bill of Sale.

States may see other country codes (e.g., “IT” for Italy, “CN” for China or “CA” for Canada). USCG regulations do not address foreign country codes, so they are treated as additional information near the HIN and should be separated by a border. States should not restrict a

registration simply for not having a border. If a state issues a certificate of number to a vessel with a foreign country code, it should ensure that the MIC was issued to a US-based manufacturer or importer and corresponds with the vessel and the vessel's supporting documentation such as a Manufacturer's Statement of Origin (MSO) and/or a Bill of Sale.

9. Hull Identification Number Display. In accordance with ref. (a), HINs must be permanently affixed to the vessel so that any alteration, removal, or replacement would be obvious. If the HIN is on a separate plate, the plate must be fastened in such a manner that its removal would normally cause some scarring of, or damage to, the surrounding hull area. A HIN must not be attached to parts of the vessel that are removable. For more information, reference 33 CFR §181.29 at <https://www.ecfr.gov/current/title-33/chapter-I/subchapter-S/part-181/subpart-C/section-181.29>.
10. HIN Verification. The verification process is intended to ensure the states and the USCG can accurately identify a vessel if there is a potential non-compliance issue. In accordance with ref. (b), a state issuing authority must verify that the vessel displays a properly formatted HIN prior to performing **any** action defined as issuing, renewing or updating a certificate of number. If a state suspects that a manufacturer is not properly identifying and labeling their vessels in accordance with ref. (a) and is encouraging their customers to apply for a state assigned HIN, the state should not issue a certificate of number or a state assigned HIN and should contact the USCG immediately via rbscompliance@uscg.mil.

The following are acceptable methods to assist in verifying a vessel's HIN and MIC:

- a. Physical inspection by a state official to verify vessel information. (This includes the HIN, make, model, year, hull material, propulsion, length, and vessel registration number, if assigned.);
- b. Photograph of the HIN;
- c. Signed affidavit by the vessel owner attesting to the accuracy of the HIN;
- d. Contact with the manufacturer (if in business) to verify the HIN; or
- e. Pencil tracing of the HIN.

NOTE: The following are methods for validating some aspects of a HIN but should not be considered as verification of a HIN:

1. USCG MIC website - <https://uscgboating.org/content/manufacturers-identification.php>. This website can be used to confirm the validity of the MIC; and
2. National Insurance Crime Bureau (NICB) - The NICB maintains a database for which some manufacturers voluntarily submit HIN information. It is primarily used to locate hidden HINs on stolen vessels. Law Enforcement Officers (LEO), or other authorized persons can contact the NICB to determine if they have any information on a HIN in question.

11. State assigned HIN Format: If a vessel does not have a HIN that meets the requirements of ref. (a), the state may assign a HIN (informally referred to as a “Z Number”) in the scenarios listed in para. 12 below. State assigned HINs must use the following format:

MIC	Serial #	Month/Year of Issue	Year of Issue
CFZ	123XY	F3	23

- a. Characters 1-3 represent the MIC, which shall consist of the two-letter abbreviation for the state issuing authority found in 33 CFR §173, Appendix A followed by the letter Z.
- b. Characters 4-8 represent the state assigned serial number and may be any combination of letters and numbers the state issuing authority chooses with exception of the letters “I”, “O”, or “Q”.
- c. Characters 9-10 represent the month and year of issue. Character 9 represents the month and is designated by letters “A” through “L”, which correspond to January through December, respectively. Character 10 is the last digit of the calendar year the state assigned HIN was issued (e.g., “3” is 2023).
- d. Characters 11-12 represent the last two digits of the calendar year the state assigned HIN was issued (character 12 shall be a repeat of character 10).

Each state assigned HIN issued must be unique and can only be assigned once. Once a state assigned HIN is issued, it remains with the vessel, even if the vessel becomes numbered in another state. A list of MICs reserved for governmental use that may appear in HINs is included in enclosure (1) to this policy.

If the vessel has a non-compliant manufacturer-affixed HIN, the state assigned HIN shall be affixed directly above, below, or next to the original non-compliant HIN to preserve the historical integrity of the original HIN. The state assigned HIN shall be affixed in accordance with 33 CFR §181.29.

NOTE: The model year of the vessel is not captured within a state assigned HIN. However, the model year shall be documented on the certificate of number issued by the state. If the model year is unknown, each state shall use “1111” on the certificate of number.

12. State Assigned HIN Circumstances: States should take great care and caution when assigning a HIN to a recreational vessel and should attempt to verify the existence and format of the duplicate HIN. In general, there are only two scenarios when a state assigned HIN should be issued:

- a. No HIN is present:
 - i. For homebuilt vessels States should issue a state assigned HIN.
 - ii. For commercial vessels see para. 15a.
 - iii. For self-imported vessels States should issue a state assigned HIN using the format in para. 13.
 - iv. For recreational vessels missing a HIN that were manufactured more than ten years ago States should issue a state assigned HIN.

- v. For recreational vessels missing a HIN that are within ten years of manufacture and the manufacturer is still in business States should contact the USCG at rbscompliance@uscg.mil and request further guidance.
- b. Improperly Formatted HINs. Ref. (b) requires states to verify HINs prior to issuing a vessel a certificate of number. Recreational vessels with non-compliant HINs typically fall into two categories:
 - i. For recreational vessels with an improperly formatted HIN that are within 10 years of manufacture:
 - a) If the manufacturer is still in business, contact the USCG at rbscompliance@uscg.mil to correct the HIN.
 - b) If the manufacturer is out of business, issue a state assigned HIN.
 - ii. For recreational vessels manufactured more than 10 years ago:
 - a) Issue a state assigned HIN to be affixed above, below, or next to the manufacturer's non-compliant HIN; and
 - b) Document the discrepancy in the vessel's record and advise the owner to keep a copy for their records and maintain a copy on the vessel while underway.

NOTE 1: The presence of a state assigned HIN (recognizable by a MIC that includes the state abbreviation followed by the letter Z) indicates that the state assigned HIN is the only valid HIN. Any other HIN present on a vessel with a state assigned HIN is considered a "legacy HIN," should be documented in the vessel's record as such, and not used for any purpose.

NOTE 2: States shall not provide single or blocks of state assigned HINs to persons or manufacturers offering recreational vessels for sale. Anyone that constructs a single recreational vessel for the purpose of immediate sale is considered a manufacturer and must apply for a MIC from the USCG and permanently affix a properly formatted HIN starting with their MIC to the recreational vessel. States should be aware that manufacturing a recreational vessel and offering it for sale or importing a recreational vessel for sale that is not in compliance with the regulations prescribed under the authority of 46 USC §4301 and 33 CFR §181.29 is a violation of 46 USC §4307 and is against the law.

- 13. Homebuilt Vessel HIN Assignments. Homebuilt vessels are constructed by individuals for their own use and not offered for sale. Because of this, these vessels may not always be built to recreational vessel safety requirements in 46 USC §43 and 33 CFR Subchapter S. The owner should apply for a state assigned HIN from the state issuing authority in the state in which the vessel will be principally operated.
- 14. Sale of Homebuilt Vessels. The intention of the Federal regulations is to prohibit the sale of homebuilt recreational vessels that may not meet the safety standards is found within 46 U.S.C. §43 and 33 CFR Subchapter S. However, the USCG recognizes that the sale of homebuilt recreational vessels may be appropriate in limited circumstances. To allow for the sale of homebuilt recreational vessels, the USCG has determined that the homebuilt recreational vessel must:
 - a. meet the requirements set forth within 33 CFR Subchapter S;

- b. have been inspected via an independent marine surveyor with a nationally accredited certification such as National Association of Marine Surveyors (NAMS) or Society of Accredited Marine Surveyors (SAMS). A survey report shall be provided to the state upon sale of the vessel; and
- c. not be sold within 10 years of the issuance of the state assigned HIN.

NOTE: Homebuilt vessels that are gifted at any time to another person are acceptable. Ref. (a) states that the sale of a vessel is the defining factor between a homebuilt vessel and a manufacturer-built vessel. The gifting of a homebuilt vessel does not hold the builder that is doing the gifting to the safety standards that a professional boat builder would need to uphold if they were selling for profit.

15. Other HIN Situations.

- a. **Commercial Vessels.** Any vessel not built to the requirements of 46 USC §43 and 33 CFR Subchapter S and that does not have a manufacturer-supplied HIN and a compliance certification label (if applicable) affixed by the manufacturer is considered a “commercial” vessel. For those commercial vessels that do not meet the recreational requirements, the state should clearly indicate the vessel is for commercial use only on the titling and registration paperwork and is prohibited from issuing a state assigned HIN to the vessel.
- b. **Duplicate HINs.** The USCG began requiring duplicate HINs on August 1, 1984. Also known as confidential HINs or hidden HINs, duplicate HINs must be affixed in an unexposed location on the interior of the vessel or beneath a fitting or item of hardware. The USCG does not have records on the placement of duplicate HINs. If the manufacturer cannot confirm the location (i.e., they are out of business or don’t have records), law enforcement can contact the NICB to see if the duplicate HIN location has been recorded in their database.
- c. **Legacy HINs.** A legacy HIN is any HIN associated with a vessel that is different from what is recorded on its current certificate of number.
 - i. They exist primarily due to human error. Either the owner of the vessel interpreted and/or recorded the HIN incorrectly, or a clerical error was made at the time of registration/titling/documentation.
 - ii. Other reasons include manufacturer error, an illegible or entirely missing HIN, or an intentionally altered HIN to hide the vessel’s identity.
 - iii. When a state issues a state assigned HIN or discovers a legacy HIN, a best practice is to add the legacy HIN to a field on the registration record named “Previous HIN.” This field would be used to record the most recent prior HIN and could be added to the interstate report and VIS data feed.
- d. **USCG Assigned HINs.** The following two USCG Commands are authorized to issue a HIN:
 - i. Office of Auxiliary & Boating Safety (CG-BSX) issues HQZ.
 - ii. National Vessel Documentation Center (NVDC) issues USZ.

A list of MICs reserved for governmental use that may appear in HINs is included in enclosure (1).

- e. Multiple HINs. In general, a recreational vessel should only have one primary HIN in addition to a duplicate HIN hidden on the interior of the vessel. However, there are several scenarios in which a vessel might have more than one primary HIN:
 - i. Original HIN improperly formatted and replaced by a state or USCG assigned HIN;
 - ii. Foreign-built vessel imported by a private owner for personal use; and
 - iii. Foreign-built vessel imported by a U.S. importer for sale.

On vessels with multiple HINs, the valid HIN is identified by:

- 1) A state- or USCG assigned HIN with the MIC ending in “Z”; or
- 2) HINs displaying the US country code prefix (or no prefix) with a USCG-issued MIC verified through the MIC database found at <https://uscgboating.org/content/manufacturers-identification.php>.

For questions regarding a multiple HIN situation, contact the USCG at rbscompliance@uscg.mil for further guidance.

- f. Bare Hulls. A bare hull is an empty, unfinished hull with no installed seating, controls, consoles, flotation, navigation lights, or other associated equipment. Therefore, bare hulls are not subject to USCG safety standards and are not required to have HINs. Bare hulls acquired for the purpose of building a homebuilt vessel should be issued a state assigned HIN as a homebuilt vessel in accordance with para. 13 above. For more information on bare hulls, view the 87th Boating Safety Circular published in December 2013 at: <https://uscgboating.org/content/boating-safety-circulars.php>.
- g. Kit Boats. A kit boat is a partially built vessel sold by one entity with assembly completed by another entity, is considered a manufactured vessel, and must have a HIN provided by the manufacturer of the kit. States are prohibited from assigning state assigned HINs to Kit Boats. For more information on Kit Boats, view the 87th Boating Safety Circular published in December 2013 at: <https://uscgboating.org/content/boating-safety-circulars.php>
- h. Imported Vessels. Recreational vessels imported for primary operation in the U.S. typically fall into one of two categories:
 - i. Recreational vessels imported for resale by a U.S. importer or U.S. subsidiary of a foreign manufacturer: the U.S. importer will have been issued a MIC from the USCG and is responsible for all recall issues on these vessels as well as ensuring a valid HIN is properly affixed to the vessel.
A single recreational vessel self-imported by an individual for their own personal use: this vessel requires a state assigned HIN from the state in which the vessel will be principally operated. It is important to verify that the owner is using this vessel for personal use and not acting as an importer. The intent of the regulation is to

allow individuals to purchase a vessel overseas and have it transported to the U.S. for personal use. If the foreign manufacturer does not intend to sell or offer for sale, introduce, or deliver for introduction into interstate commerce, or import into the United States per the Prohibited Acts (46 USC §4307), then that builder is not subject to US regulations. For a vessel to qualify as self-imported, the owner must take delivery from the manufacturer overseas and personally arrange for shipping/transportation to the United States. Documentation from U.S. Customs and Border Patrol (CBP) or a shipping agent may assist in determining a self-import. Any foreign builder that uses the internet (for example: the company website, third party retailers such as Amazon or eBay, or classified sites such as Craigslist) to sell vessels for delivery in the U.S. must use a U.S. importer that has been assigned a MIC by the USCG.

Many countries use the same HIN format as the United States; however, their MICs will most likely not be issued to the same manufacturer as in the U.S. and Canada. It is incumbent upon the state issuing authority to verify the MIC matches the manufacturer in the USCG database at: <https://uscgboating.org/content/manufacturers-identification.php>. If the MIC does not match, states should **NOT** issue a state assigned HIN and should contact the USCG at rbscompliance@uscg.mil for further direction.

- i. Vessels Built by Two Different Builders. CG-BSX-23 will occasionally encounter a situation whereby one manufacturer will start the construction of a vessel, and another will finish the vessel. An example is a builder that manufactures the hull and installs a fuel tank, which is sold to another manufacturer that finishes the build by installing the console, throttle cabling, electrical and navigation lights. In these cases, the HIN that is placed on the vessel should include the MIC of the manufacturer that will be responsible for any recalls should be placed on the vessel.
- j. Date of Certification/Manufacture-Model Year Correlation. Ref. (a) and (c) do not tie the certification or manufacture date to the model year. Ref. (c) states that the HIN must include either the date on which a vessel is certified to comply with standards in effect at that time or the month/year during which the manufacture of a vessel begins. Conversely, model year is an arbitrary date on a calendar. As a result, there are legitimate scenarios where the certification or manufacture date can be longer than one year beyond the model year. For instance, construction may start on a vessel in November 2020 that is then completed and sold to a consumer after June 1, 2021. This scenario would allow for a “K0” for HIN characters 9 & 10 (month and year of certification or manufacture) and “22” HIN characters 11 & 12 (model year).

The intent of the legal definition of “Model Year” in 46 USC §4302 (e)(1) is to ensure a level playing field and to eliminate unfair sales practices where a manufacturer claims a newer model year than allowed. Here are two examples of an improper model year:

- i. In April 2022, a customer attempts to register a new vessel that has a Model Year 2023 in the HIN. This is an example of a non-compliant vessel because the 2023 model year does not begin until June 1, 2022.
- ii. A local, state or federal official or LEO sees a vessel in April 2022 that is legitimately for sale (typically at a dealer or boat show) with a 2023 model year, and the vessel is not for presentation/demo purposes only. This is a violation of federal law because 2023 model year vessels cannot be sold prior to June 1, 2022.

These two examples do not tie the date of certification/manufacture to the model year but instead rely on known evidence of a vessel sold with a newer model year than allowed, since it is prior to the June 1st date on which the newer model year begins.

NOTE: There is no requirement to end a model year. If a manufacturer decides to maintain a certain model year past July 31st of a year, it may do so. It is uncommon, but allowable. For example, a vessel with a month of manufacture of August 2022 (H2) may remain a 2022 model year even though it can be designated as a 2023 model year vessel.

- k. Vessels that do not require a HIN. The USCG has determined that the following non-motorized vessels do not require HINs:
 - i. Sailboards;
 - ii. Stand Up Paddleboards (SUPs); and
 - iii. Kiteboards.

NOTE: These vessels do not require a HIN from the manufacturer upon sale if they are not motorized. In some instances, an owner may motorize a canoe, kayak or SUP after the initial sale. In these cases, the states should treat them as a motorized vessel and issue a certificate of number, which would require a state assigned HIN.

- l. eFoils and motorized surfboards. In accordance with ref. (f), these devices are considered recreational vessels by the USCG and are required to have a HIN.
- m. Unique vessels. The Coast Guard is constantly evaluating new vessel designs and technology to see how they fit within the scope of the regulations. An example of this is called a PWC Combination Unit (see ref. (h)). Because innovation consistently outpaces regulation, the Coast Guard will use the safeafloat.com website's policy page to keep stakeholders informed as to how certain unique vessels fit within the regulations.
- n. Hull swaps. In certain circumstances the hull of a boat may be replaced. If the hull is replaced using a bare hull (no assigned HIN) but the engine(s), components, fittings, rigging, etc. are carried over from the original hull to the new hull, the existing HIN from the original hull may be used and USCG approval is not needed to affix the original HIN to the new hull. The HIN must be the exact HIN from the original vessel and cannot be renewed as a new vessel within characters 9-12 of the HIN, even if the vessel has been refitted, renovated or restored.

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- o. HIN changes. The HIN is not authorized to be removed or altered per 33 CFR 181.35 with the exception of the circumstances outlined in paragraph 15.n. above. In rare circumstances where it may be necessary to change a HIN, only the Chief of the U.S. Coast Guard's Recreational Boating Product Assurance Branch may authorize a HIN change. If the USCG authorizes a HIN change, it will be done via a letter from the USCG that must accompany the boat's certificate of number for the life of that boat. The state numbering authority in which the boat is principally operated will also be notified of an authorized HIN change by the USCG. The USCG assigned HIN shall be affixed directly above, below, or next to the original non-compliant HIN to preserve the historical integrity of the original HIN. The USCG assigned HIN shall be affixed in accordance with 33 CFR §181.29.
16. Disclaimer. The guidance in this policy letter is not a substitute for applicable legal requirements and is not a rule. It is not intended to impose legally binding requirements on any party. This guidance represents the USCG's current rationale on this topic and may assist industry, mariners, the public, and the Coast Guard, as well as other Federal and state regulators, in applying statutory and regulatory requirements. An alternative approach for complying with these requirements is acceptable if that approach satisfies the requirements of the applicable statutes and regulations.
17. Changes. This policy will be revised as necessary. It will be available with any changes on the CG-BSX-23 website at <https://safeafloat.com/policies-letters/>. Questions concerning compliance with recreational vessel manufacturing requirements should be directed to Commandant (CG-BSX-23), Recreational Boat Product Assurance Branch, Office of Auxiliary & Boating Safety at rbscompliance@uscg.mil.

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