

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commandant  
United States Coast Guard

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APR 30 2007

Mr. John Simmons  
Director, Bureau of Boating and Education  
Pennsylvania Fish & Boat Commission  
PO Box 67000  
Harrisburg, PA 17106

Dear Mr. Simmons:

Thank you for your inquiry as to whether or not an "Argo Amphibious ATV" is considered by the U.S. Coast Guard to be a vessel.

In response to your request, my office has researched the criteria used and guidance provided in previous legal opinions regarding whether or not a specified device is a vessel under 1 U.S.C. § 3.

Based on the information available, the U.S. Coast Guard has determined that, while on the water, the device known as the Argo Amphibious ATV is a vessel under 46 U.S.C. § 2101, and therefore subject to applicable regulations administered by the U.S. Coast Guard and its Office of Boating Safety, unless specifically exempted.

Thank you again for bringing this matter to our attention. If there is any additional information or clarification that I can provide, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey N. Hoedt".  
JEFFREY N. HOEDT  
Chief, Office of Boating Safety  
U.S. Coast Guard