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October 9, 2020

Dear Boating Law Administrator/Registration and Titling Manager:

The purpose of this letter is to provide guidance and clarification to all 56 states and territories on the intent Title 33 CFR Subchapter S (§§ 173 - 187), specifically 33 CFR § 174.16.

On March 28, 2012, the Coast Guard published a Final Rule in the Federal Register entitled “Changes to Standard Numbering System, Vessel Identification System and Boating Accident Report Database” (77 FR 18689). A portion of that rule revised 33 CFR § 174 “State Numbering and Casualty Reporting Systems” by adding 33 CFR § 174.16 “Verification of Hull Identification Numbers (HINs).” Since the rule was published, states and territories have raised numerous questions about the HIN verification process.

To clarify how to implement the regulation, CG-BSX-2 worked with the National Association of State Boating Law Administrators (NASBLA) to create the HIN Validation & Verification Guideline 2018 PowerPoint (VVGP), and posted it to the NASBLA webpage NASBLA HIN VVGP. In 2020, the HIN VVGP was revised to address issues raised by the States and USCG.

In order to comply with the provisions of 33 CFR § 174.16, State issuing authorities must:

1. Determine whether a vessel has a primary HIN meeting the requirements of 33 CFR § 181 subpart C. The issuing authority may determine how the HIN can be presented for verification.

Acceptable methods include:

- Pencil tracing;
- Photographs;
- Physical inspection by a state official;
- Signed affidavit by the owner attesting to accuracy of the HIN;
- Contacting the manufacturer;
- Checking the USCG MIC website to confirm the validity of the HIN; and
- Checking the National Insurance Crime Bureau (NICB) database.

Information in the HIN VVGP will assist the issuing authority in determining if the HIN format is correct.

2. If the HIN is determined to be valid, take no further action.
3. If the HIN is determined to be invalid, either because of improper format or too many characters, or if the boat does not have a HIN, take the following steps:

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- If the boat is less than ten years old and the manufacturer is still in business, the state issuing authority should contact the USCG (CG-BSX-23) at the contact information provided in the header to this letter, and the USCG will authorize the manufacturer to correct the HIN discrepancy.
- If the boat is less than ten years old and either the manufacturer is out of business or if the boat does not have a HIN, the state should issue a state-assigned HIN using the current format.
- If the boat is more than ten years old, the state should issue a state-assigned HIN using the current format.

Information in the HIN VVGP will instruct the issuing authority on the proper format of a state-issued HIN.

4. Verify that the owner of the vessel has permanently affixed the assigned primary HIN to the vessel in compliance with 33 CFR § 181 subpart C. The issuing authority may determine appropriate methods of verification based on their specific circumstances. The PowerPoint has been uploaded and posted to both USCGBoating.org and NASBLA.org.
5. Questions or concerns with this policy should be directed to the State Recreational Boating State Program Coordinator (SPC) assigned to each state and territory.

Sincerely,



S. L. Johnson
Captain, U.S. Coast Guard
Office Chief, Auxiliary and Boating Safety

Enclosure: (1) USCG/NASBLA HIN Validation & Verification Guideline 2020 Power Point

Copy: NASBLA Executive Board
NASBLA VIRT Committee