



16711/141.340
16714/160.053/116
16714/160.076/5300
CORR: 2019-0388
July 6, 2020

Mr. Wendell Uglene
Mustang Survival ULC
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Burnaby, BC V5J 5L1
CANADA

Subj: ALTERNATE ARRANGEMENTS FOR LIFEJACKETS; SUBCHAPTER M
TOWING VESSELS

In response to your email dated June 18, 2019, we have reviewed the proposed alternative arrangement to the lifejacket requirements of 46 CFR 141.340(a) to use your model MD3188 "H.I.T Inflatable Work Vest" (USCG Approval Numbers 160.053/116 and 160.076/5300) to meet lifesaving carriage requirements on Subchapter M towing vessels. In accordance with 46 CFR 141.225(a), we accept this alternative as equivalent for towing vessels that operate exclusively on Rivers, Lakes, Bays and Sounds routes. If the scope of our approval for this device changes in the future, we will reconsider the terms of this alternative arrangement. This letter should be provided with the sale of the device.

To utilize this alternative arrangement, vessels must meet the following requirements:

- The device must be worn at all times.
- This device may only be used when air temperature is above 32°F, due to its reliance on CO₂ for full inflation and buoyancy.
- The operator must check that the device is properly armed prior to wearing.
- The device must meet the rest of the requirements in 46 CFR 141.340, including fitting a whistle and an approved lifejacket light. The whistle and approved lifejacket light should be fitted in accordance with the manufacturer's instructions.
- The operator must inspect and maintain the device in accordance with the manufacturer's instructions.
- The device must be serviced at a manufacturer approved servicing facility at 12 month intervals.
- The approved servicing facilities must conduct servicing in accordance with the manufacturer's service manual.
- The vessel must maintain a copy of the device servicing and inspection records onboard for at least the previous 5 years.
- If the vessel has a TSMS, this alternative arrangement must be documented as part of their procedures to prepare for and respond to emergency situations.
- The vessel must maintain a copy of this letter onboard the vessel.

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In order for the device to be considered a life saving device to meet the carriage requirements of 46 CFR 141.340, the device must be worn at all times when the vessel is in a working status, whether underway or moored. As this is not feasible for sleeping crew, this alternative arrangement is not available to vessels with overnight accommodations. When a vessel is utilizing this alternative arrangement to meet 46 CFR 141.340 (a), no additional lifejackets are required in accordance with 46 CFR 141.340 (c).

This alternative arrangement, granted under 46 CFR 141.225, applies only to vessel subject to Subchapter M. If the vessel is inspected under another subchapter or engaged in multi-service, this alternative arrangement cannot be extended to another subchapter.

This alternative arrangement is based on the robust performance testing conducted by a USCG accepted independent laboratory. Although Model MD3188 does not have the redundant inflatable chambers required by 46 CFR 160.176, model MD3188 does meet the minimum in-water performance requirements equivalent to a commercial lifejacket. Because model MD3188 incorporates durable material to mitigate the risk of puncture or abrasion of the inflatable compartment, we have determined that model MD3188 provides an equivalent level of safety in the conditions stated above. In 2009, we approved this device as an inflatable work vest and have had positive experience with its use in the commercial environment over the past 10 years.

For compliance questions regarding this alternative arrangement, please contact your cognizant OCMI or the Towing Vessel National Center of Expertise at tvncoe@uscg.mil. For type approval questions please contact ENG-4 at typeapproval@uscg.mil.

This letter and all attachments were delivered electronically to wuglene@mustangsurvival.com. No hard copies will be provided. You are welcome to print as many copies as you wish. If you have any follow-up to this approval, please contact typeapproval@uscg.mil. Please reference ID#: 2019-0388 in any correspondence related to this project.

Sincerely,

B. A. BALDWIN
Chief, Lifesaving and Fire Safety Division
U.S. Coast Guard
By direction

Copy: (1) COMDT (CG-CVC)
(2) CG TVNCOE