

March 25, 2026

Admiral Kevin E. Lunday
Commandant, United States Coast Guard
Washington, D.C. 20593

Re: Urgent Request to Designate Vessel Traffic Services and Merchant Mariner Credentialing as Essential National Security Functions During the DHS Funding Lapse

Dear Admiral Lunday,

On behalf of the American maritime industry, including maritime unions, shipowners, trade associations, port authorities, towing and offshore service companies, and the thousands of merchant marine who crew the vessels that sustain our nation's commerce and defense, we write to you with deep urgency. The ongoing lapse in funding for the Department of Homeland Security is causing immediate, serious, and compounding harm to maritime safety, commerce, and national security. We respectfully but strongly urge you to designate the Vessel Traffic Services (VTS), the National Maritime Center's (NMC) Merchant Mariner Credentialing program, and the National Vessel Documentation Center (NVDC) as essential functions exempt from furlough, and to restore full operational staffing to all three programs without delay.

I. Vessel Traffic Services

Similar to the Federal Aviation Administration's National Airspace System (NAS), the Vessel Traffic Services (VTS) is implemented by the United States Coast Guard (USCG) to improve the safety and efficiency of vessel traffic. VTS centers monitor and manage the movement of commercial vessels through the nation's most congested and hazardous waterways, including the Ports of Los Angeles/Long Beach, New York/New Jersey, Houston, Puget Sound, San Francisco Bay, and the lower Mississippi River.

The suspension of VTS operations during the current funding lapse creates conditions directly analogous to what the aviation industry would face if air traffic controllers were furloughed. Vessels transiting without active VTS oversight face elevated risk of collision, allision with fixed structures, grounding, and hazardous material spills. Unlike aircraft, large commercial vessels require miles to stop and cannot deviate from narrowly dredged channels. A single incident in a major port can close that port for days or weeks, cascade into supply chain disruptions of national consequence, and risk catastrophic environmental damage.

Congress and the American public understood immediately that furloughing air traffic controllers during a government shutdown was unacceptable. We respectfully submit that the same logic applies with equal force to Vessel Traffic Services. We urge you to invoke your authority to designate VTS personnel as exempt employees performing work essential to the protection of life and property, and to restore full operational manning at every VTS center in the country.

II. Merchant Mariner Credentialing

Every mariner who serves aboard a U.S.-flagged vessel is required by federal law and international treaty to hold a valid credential issued by the National Maritime Center. Without a current credential, a mariner cannot legally stand a watch, sail as an officer, or hold a safety-critical position aboard a ship. There are no waivers, no grace periods, and no foreign substitutes. A credential that expires is a credential that ends a mariner's ability to work.

The NMC's slowdown of credentialing operations during the current lapse is already producing a cascading workforce crisis. Mariners whose credentials are expiring or awaiting renewal cannot be assigned to billets. Manning shortfalls are spreading from vessel to vessel as companies scramble to cover gaps with the shrinking pool of mariners holding valid credentials. This is not a paperwork inconvenience. It is a direct threat to vessel safety, to port operations, and to the United States' ability to sustain its merchant fleet.

The merchant marine is explicitly recognized in the Merchant Marine Act of 1936 as an auxiliary of the U.S. Navy, essential to national defense. The men and women of this fleet move the equipment, fuel, and supplies that sustained American forces in every conflict of the twentieth century, and they stand ready to do so again. Allowing their credentialing infrastructure to lapse is to undermine the very workforce readiness that national defense planning depends upon.

III. National Vessel Documentation

The National Vessel Documentation Center (NVDC) is the federal registry through which vessels are enrolled under the U.S. flag, establishing ownership, and nationality. This documentation is the legal foundation upon which vessel ownership, financing, and commercial operations rest.

The NVDC's reduced operations during the current funding lapse have effectively frozen vessel movements into and out of U.S. documentation. Owners seeking to document newly acquired vessels cannot obtain the Certificate of Documentation required to place those vessels in service. Operators seeking to transfer documented vessels – through sale, refinancing, or change of ownership – face the same impasse. The practical result is that vessels that should be entering the active fleet cannot do so, and vessels that should be transitioning to new ownership or operators are stranded in limbo.

This freeze compounds the manning and operational pressures already created by the credentialing backlog. A vessel that is not properly documented cannot be lawfully operated in the trades for which it was acquired. Financial institutions holding preferred ship mortgages face recording delays that cloud title and create uncertainty in the maritime lending market. New construction deliveries, vessel acquisitions, and fleet transactions that have been planned and financed for months are now stalled by an administrative stoppage that serves no safety or security purpose.

IV. Our Requests

We respectfully request that you take the following immediate actions:

1. Designate all Vessel Traffic Services centers as performing functions essential to the safety of life and property, and restore full operational staffing immediately;
2. Designate the National Maritime Center's credentialing and examination operations as essential to national security and the defense industrial base, and restore full NMC staffing to process all pending applications, renewals, and examinations without further delay;
3. Designate the National Vessel Documentation Center's documentation, titling, and mortgage recording operations as essential to commerce and the integrity of the U.S. vessel registry, and restore full NVDC staffing so that vessels may lawfully enter and exit U.S. documentation without further delay;
4. Communicate directly with the Secretary of Homeland Security and, if necessary, the White House Office of Management and Budget, urging that maritime safety, credentialing, and documentation functions be treated with the same policy priority as aviation safety functions under any shutdown or funding lapse scenario.

We stand ready to meet with you and your staff at the earliest opportunity to discuss these concerns in greater detail and to provide any supporting data or operational information that would be of assistance. Each day of delay deepens the credentialing backlog, compounds the risk to vessel traffic, freezes lawful vessel transactions, and erodes the confidence of the mariners and vessel operators who depend on the Coast Guard as a partner in safety.

Thank you for your service, leadership, and urgent attention to this matter.

Respectfully submitted,

Alaska Longline Fishermen's Association
Alaska Tanker Company
Alliance for Chemical Distribution
American Association of Port Authorities (AAPA)
American Commercial Barge Line
American Maritime Congress
American Maritime Officers
American Maritime Officers Service
American Merchant Marine Veterans
American Pilots' Association
American Radio Association
American Waterway Operators
Apostleship of the Sea of the United States of America
Association of Ship Brokers & Agents
Axaxl
BeyondX LLC
Big River Coalition, LLC
Centerline Logistics
Chamber of Marine Commerce
Chamber of Shipping of America
Council of American Master Mariners
Crowley
Cruise Lines International Association (CLIA)
Dann Marine Towing
Dann Marine Towing, LC
Detroit Customs Brokers and Freight Forwarders Association
Dredging Contractors of America
Federal Pilots & Docking Masters of Louisiana
Florida Keys Commercial Fisherman's Association
Great Lakes Dredge & Dock
Great Lakes Maritime Academy
Gulf of America Reef Fish Shareholders' Alliance
Hay Tug & Launch Services Inc.
Houston Customs Brokers & Freight Forwarders Association (HCBFFA)
Inlandboatmen's Union Of The Pacific, Marine Div, ILWU
Interlake Maritime Services
International Longshore and Warehouse Union (ILWU)
International Organization of Masters Mates & Pilots
International Propeller Club
International Ship Masters' Association
International Trade & Transportation, Inc
Justin R Pierson, LLC
Lake Carriers' Association
Liberty Maritime Corporation
Loadstar Product Handling Services, LLC
Los Angeles Customs Brokers & Freight Forwarders Association (LACBFFA)
Louisiana Maritime Association
Louisiana Maritime Chamber of Commerce
Macht Maritime Strategies LLC
Maersk Line, Limited

Marine Engineers' Beneficial Association
Marine Exchange of Alaska
Marine Exchange of Puget Sound
Marine Exchange of Southern California
Marine Exchange of the San Francisco Bay Region
Marine Firemen's Union
Maritime Accelerator for Resilience
Maritime Association of NY/NJ
Maritime Association of South Carolina
Maritime Exchange for the Delaware River & Bay
Maritime Information Services North America
Maritime Institute for Research and Industrial Development
Maritime Trades Department, AFL-CIO
Martin Marine
Merchant Mariner GOA
Mid-Valley Customs Brokers Association
National Association of Waterfront Employers
National Customs Brokers and Forwarders Association of America (NCBFAA)
National Industrial Transportation League
Houston Customs Brokers & Freight Forwarders Association (HCBFFA)
New Orleans Board of Trade
New York/New Jersey Foreign Freight Forwarders & Brokers Association (NYNJFFFBA)
North Texas Customs Brokers & Freight Forwarders Association
Northern Border Customs Brokers Association
OSG Ship Management, Inc
Patriot Maritime
Port Arthur International Seafarers' Center
Sailors' Union of the Pacific
Seafarers International Union of North America
Sealift Inc.
Southeastern Fisheries Association
Strategic Towing Services
Texas A&M at Galveston Maritime Academy
The Apostleship of the Sea/Stella Maris - Diocese of Beaumont
The Boat Owners Association of The United States, BoatU.S.
The Pasha Group
The Vane Brothers Company
Towing Vessel Inspection Bureau
Transportation Institute
U.S. Ocean
Virginia Maritime Association
Western Towboat Company
Wilmington Tug, Inc