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5 Jul 2019

TO: Boating Law Administrators  
FROM: Chief, Boating Safety Division (CG-BSX-2)  
SUBJ: Vessels Powered by Personal Watercraft

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This memo answers questions concerning “combination” vessels (i.e., a traditional boat hull powered by a personal watercraft or PWC). In the past these vessels have been marketed under the names “Shuttle Craft” and “Windjet” and are currently marketed under the name “Wave Boat.”

**Q1:** How should States treat vessels that are powered by a PWC?

**A1:** Treat combination vessels such as the “Shuttle Craft,” “Windjet,” and “Wave Boat” as conventional powered boats. They are designed primarily for propulsion by a motor, in this case by one or two PWCs. Purchasers do not use such vessels as unpowered rafts.

**Q2:** Do they need Hull Identification Numbers (HINs)?

**A2:** Yes, as required by 33 CFR 181, Subpart C.

**Q3:** Do they need a Certificate of Number?

**A3:** Yes, as required by 33 CFR 173, Subpart B. Since these vessels are designed primarily for propulsion by a motor, they should have their own State number, because the features of the combination vessel(s) would differ from those of the PWC(s) when the vessels are combined, and the registration number(s) on mated PWC(s) would not be visible. They should be classified as inboard-powered open motorboats propelled by water jet.

**Q4:** When does such a product become a vessel?

**A4:** 1 USC 3 defines the term “vessel” as including “every description of watercraft or other artificial contrivance used, or capable of being used, as a means of transportation on water.” The manufacturers of these vessels design and advertise them as a means of transportation on the water.

**Q5:** Should these vessels have a U.S. Coast Guard Maximum Capacities Label?

**A5:** Yes, if less than 20’ in length as required by 33 CFR 183, Subpart B.

**Q6:** Are such vessels considered boats for accident reporting purposes?

**A6:** Yes, as required by 33 CFR 173, Subpart C.

If you have any additional questions, please contact your Program Coordinator.

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Cc: NASBLA Vessel Identification, Registration & Titling Committee  
USCG District RBS Specialists