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# LL39 Structure of a lower freeboard deck (Regulation 3(9))

(1977)  
(Rev.1  
July 2008)

When a lower deck is designated as the freeboard deck, it shall be continuous in fore and aft direction as well as athwartships. Such a freeboard deck as a minimum shall consist of suitable framed stringers at the ship sides and transversely at each watertight bulkhead which extends to the upper deck, within cargo spaces. The width of these stringers shall not be less than can be conveniently fitted having regard to the structure and the operation of the ship. Any arrangement of stringers shall be such that structural requirements can also be met.

## NOTE

Member Societies formulated this Interpretation in order to have a guide when judging whether a structure below the uppermost complete deck can be designated as a freeboard deck in terms of Regulation 3(9) for the application of tonnage regulations. This was done, although it is obvious that such a structure has no significance with regard to the philosophy of the Load Line Convention.

Nevertheless it is felt that it would be preferable if tonnage and load line matters could be clearly separated by deleting from the Load Line Convention the reference to a lower deck being designated as the freeboard deck.

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Footnote: This UI is also applicable to Regulation 3(9) of the 1988 Protocol.

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