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August 10, 2018

Puget Sound Pilots

Captain Eric vonBrandenfels, President

101 Stewart Street, Suite 900

Seattle, WA 98101

Via email: president@pspilots.org

Re: Proposed Language for 2019 Agency Request Legislation

Dear Captain vonBrandenfels,

We are in receipt of your proposed revisions to RCW 88.16.103 *Mandatory rest periods for pilots and pilot trainees-Assignment refusal-Penalty*, received on August 6, 2018.

Proposing Agency Request Legislation regarding this matter positions the Board as the initiator with stakeholders as the supporters. As the initiators, we have been advised that we will need to be able to back up the requested changes to our RCW with data. Dr. Czeisler's report and other studies will serve as general sources of information. However, we anticipate that questions regarding specific current practices and assignment levels will be asked by OFM and legislators. We need to be able to answer those questions, and we will likely include data in presentations to the respective legislative committees.

In order to do that effectively, we must have data from PSP to back up the anticipated requests. We will need the following information for a recent 12-month period:

- Total Assignment Time (our understanding based on our Definitions is that Assignment time includes prep, travel to and from, and bridge time) broken out by activity, pilot and assignment;
- Enough data to be able to track specific work-loads for each pilot. We are sensitive to your concern about pilot names, and understand that these may be redacted, and information is given by pilot number rather than name; and
- Additional columns of information on the monthly Excel Pilot Earned Group spreadsheet: *Pilot Name (or license number); Vessel Type; Bridge Time; Allowed Prep Time; Allow Travel Time; Petroleum Product as Bulk Cargo; In Ballast; 2nd Pilot; and Reposition.*

This exercise may help with establishing future reporting for the new RCW language, if the legislation is enacted.

As a regulatory agency, we need to be able to show that we are doing our own due diligence and not just relying on the word of the stakeholders. We appreciate all the work you've put into this request and look forward to working together to get it through the Legislature.

Best regards,



Sheri J. Tonn, Chair

cc: Linda Styrk, Puget Sound Pilots
Board of Pilotage Commissioners
Mike Moore, PMSA
Lou Paulsen, NWSA
Gary Nelson, Port of Grays Harbor