



April 4, 2024

Dear Chair Tonn:

Puget Sound Pilots requests a hearing at the July 18, 2024, meeting of the Washington Board of Pilotage Commissioners to address the number of pilots pursuant to WAC 363-116-065 and to establish a target assignment level to optimize the operation of a safe, fully regulated, efficient, and competent pilotage service. PSP believes that pilot workload and ship traffic necessitates this evaluation to address both pilot fatigue management demands and stubbornly high numbers of callback jobs in the Puget Sound pilotage district.

At the July 2019 meeting of the Board of Pilotage Commissioners, the board voted to examine the definitions of a pilot assignment, target assignment level, and workload while considering the fatigue management recommendations offered by recognized national fatigue management experts. PSP believes that the time is ripe for an 065 hearing as the BPC authorized 56 pilots in 2019 and PSP only attained that number yesterday.

Thank you so much and look forward to talking with you soon.

Sincerely,

Charles Costanzo
Executive Director
Puget Sound Pilots



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