

**BOARD OF PILOTAGE COMMISSIONERS**

**BPC Responses to Stakeholder Questions Submitted 4/26/2019**

Stakeholder:	#	Question/Data Request:	BPC Response:
PMSA	1	Please include questions submitted to NASA from the FMC as they have data and analysis requests embedded in them that are relevant to the setting of the number of pilots.	<i>FMC questions to NASA are available to all on in the public record section of the Board's website.</i>
PMSA	2	Data to support a regional maritime economic outlook. BPC staff to present data/graphs/trends on as much of this as they can.	<i>Data/graphs are provided on a monthly basis to the Board and stakeholders by BPC staff. BPC relies on the stakeholders' monthly activity reports as information on maritime forecasting and outlook. BPC does not analyze and project shipping trends, etc.</i>
PMSA	3	A breakdown of type and number of assignments per day/month/season separating the cruise ship activity in order to best identify and display non-cruise assignment trends per day of the week and seasonally.	<i>Raw data not available from PSP.</i>
PMSA	4	Data to validate compliance with rest requirements before and after the 10-hour policy/rule was implemented.	<i>PSP's 7/10-hour rest report, in the past, had identified exceptions to the rule with an explanation of why the exception happened. Our understanding is that the current report is being revised by PSP and a updated version will be provided to the Board at the May meeting. BPC staff cannot validate rest rule compliance without start and end times per assignment.</i>
PMSA	5	Compare and contrast WSF watchstanding, transportation and rest data as well as relevant comparisons with others in the maritime sector.	<i>In progress by BPC.</i>
PMSA	6	Determine the utilization rate of pilots individually and collectively: a. Include the type of assignment (size, zone, second pilot, cancelation) and level of license necessary and how many assignments were done during duty weeks or via call backs. b. Include reasons and drivers for those at the high end of productivity versus those at the low end to better understand the wide variability and potentially identify adjustments in watchstanding, dispatch, call backs, vacation, meetings and other related factors.	<i>Raw data not available from PSP.</i>
PMSA	7	Time lost to injury and illness; request trend analysis for three or more years (longer is better). The analysis should help determine the number of duty days/assignments impacted by NFFD pilots.	<i>Raw data not available from PSP. PSP notifies BPC when an unfit for duty designation is likely.</i>
PMSA	8	Data demonstrating the number of call backs and delays resulting from pilots on vacation. How much lead time is required to take vacation? How many pilots can take vacation at the same time?	<i>Raw data not available from PSP.</i>
PMSA	9	What is the average (annual) number of pilots available for assignments each day over the past three years.	<i>Raw data not available from PSP.</i>
PMSA	10	The pilots have reported that they attend discretionary meetings-how many of the reported meetings are discretionary and how long are the meetings and what is the impact on call backs and delays? What is the average lead time for meetings for planning and dispatch purposes?	<i>Raw data not available from PSP.</i>
PMSA	11	How many times a pilot attending a meeting was taken out of rotation?	<i>Raw data not available from PSP.</i>
PMSA	12	How many annual assignments over the past 10 years has the President performed? The Vice President?	<i>BPC will look into providing this information.</i>
PMSA	13	Request staff evaluate the predictability and lead time of assignments by evaluating ship schedules and advance notice of arrival in addition to pilot ordering lead times. a. The U.S. Coast Guard (and Marine Exchange) have advance notice data b. Marine Exchange can provide AIS tracking data c. Pilot ordering times from PSP and/or shipping companies/agents	<i>Stakeholders provide this kind of information.</i>
PMSA	14	Data to support a calculation of average assignment bridge time.	<i>Raw data not available from PSP.</i>
PMSA	15	Duty Days Calculations: Data showing the average number of days/hours actually on duty versus on respite for each pilot. Specifically measure duty hours/days on transition Tuesdays.	<i>Raw data not available from PSP.</i>
PMSA	16	Call Backs and Comp Days: a. Request a graph of "call backs" against available pilots (on duty) for two-week time periods overlaying the full complement of pilots. If there is no full complement of pilots available in any given time period, the analysis should specify/highlight the reasons why. b. Comp Days taken broken out by day/month to determine trends or patterns with Days/Months on X axis and Comp Days on Y axis. A three-year trend plus at least one year during the self-correcting formula years. c. Call back volume/numbers by month/day over at least three years with causes broken out: vacation; at a meeting, NFFD, training or other. d. Call backs: the number of times over at least three years that a call back was made when a licensed pilot was available, but the assignment involved a ship size beyond the license limitation. e. Call backs: number and trends for three years prior to cruise ship activity which started in earnest in 2000. f. How many comp days are taken during the year as opposed to being saved? g. How much duty day trading is there? h. Evaluate the change in call backs and comp days pre and post 60 comp day cap instituted by PSP. i. The distribution of call backs taken per pilot.	<i>Raw data not available from PSP. BPC is preparing data for item H by the June 20th meeting.</i>
PMSA	17	Month by month comparison of cancellations over the last three years.	<i>BPC staff can accommodate this request by the June 20th meeting.</i>
PMSA	18	Show the daily distribution of assignments to determine trends.	<i>BPC can show the number of jobs per day, but without details such as who and what type of vessel.</i>
PMSA	19	How many total duty days occurred without an on-duty pilot performing an assignment?	<i>Raw data not available from PSP.</i>
PMSA	20	How many days did a pilot perform two or more assignments in a single day over the past three years?	<i>Raw data not available from PSP.</i>
PMSA	21	How many two-pilots assignments are there per month/year over the last three years?	<i>BPC can accommodate this request by the June 20th meeting.</i>
PMSA	22	How many total duty days does the pilot corps stand each year and what is the average number of duty days stood each day?	<i>Raw data not available from PSP.</i>
PMSA	23	Show the distribution and range of annual assignments per pilot over the last three years.	<i>Data provided at April 18th meeting and posted on website.</i>
PMSA	24	Data summarizing any rest rule violations over 10 years.	<i>See question #4 above.</i>

NWSA	1	In 2018, 51 licensed pilots worked a total of 7,324 assignments, an average of approximately 144 assignments per year (or approximately 146.5 assignments per pilot per year based on an effective pilot pool of 50 with one pilot serving full time as president of the Puget Sound Pilots). Also, in 2018 ten (10) pilots worked in excess of 170 assignments each (with one pilot working a total of 223 assignments). a. In accomplishing these aforementioned assignments, were the then applicable rest rules satisfied? b. If the then applicable rest rules were not satisfied, what actions have or will be taken to ensure compliance? c. If the then applicable rest rules were satisfied, how might this information influence decision-making relative to the	a. See #4 above b. See #4 above c. This is a question for future Board discussion.
NWSA	2	a. Is it the intention of the Board to place a limit on the number of accumulated "comp days" per pilot with a corresponding b. provision for compulsory acceptance of assignments for those pilots who are properly rested and have the fewest number of accumulated "comp days"?	a. Future use of the comp day system is being evaluated and discussed by BPC. b. This is a question for future Board discussion.
Pacific Yacht Mgmt	1	Can the PSP, with the current tariffs, financially support 60 pilots?	BPC no longer sets the tariff. As of July 1, 2019 this will be the responsibility of the UTC.
Pacific Yacht Mgmt	2	What cost saving measures has PSP taken to be more fiscally solvent?	BPC no longer sets the tariff. As of July 1, 2019 this will be the responsibility of the UTC.
Pacific Yacht Mgmt	3	What has the PSP done, or what do they think needs to be done, to the rotation schedule to try to avoid call backs?	Determined by PSP dispatch system and rest rules.
Pacific Yacht Mgmt	4	What is the BPC's role in keeping the PSP fiscally solvent?	The role of the BPC is to regulate compulsory pilotage in Washington state. It has not been a practice of the Board to determine business operations of Puget Sound Pilots or the Port of Grays Harbor.
Pacific Yacht Mgmt	5	What type of outreach is the PSP doing that is hindering from their ability to perform their primary job duty of moving vessels? Are pilots accumulating more comp days because they are doing outreach on their rotation days off?	Please direct this question to PSP.
Pacific Yacht Mgmt	6	Could health insurance be offered to the PSP via the State of Washington? Would this represent a cost savings measure for the PSP?	Pilots are state licensed and regulated, but are not employees of the state of Washington. State health insurance is available to employees and approved government entities.
Pacific Yacht Mgmt	7	What is the definition of an assignment?	Per the Definitions of Terms, adopted by the Board as a statement of policy on April 16, 2015, the definition of an assignment is: A billable event relating to pilotage services - a. Assignments include cancellations and ship movements, regardless of duration b. For purposes of work allocation, an assignment is considered to commence when a pilot is assigned a vessel and concludes upon the pilot's arrival at the pilot station on an outbound assignment or upon the completion of travel for an inbound assignment (or upon Cancellation).
Pacific Yacht Mgmt	8	Are there enough qualified candidates to fill 60 licenses?	Based on how retirements proceed, the 2018 exam class could potentially fill 60 licenses, if there were no retirements for the next several years.
Pacific Yacht Mgmt	9	How would additional trainees strain the system?	The training program can handle up to 10 trainees at a time. Ideally, the program would have 5-8. Trip availability determines number of trainees.
Pacific Yacht Mgmt	10	What would the BPC do if there were several unfilled licenses for a period of several years?	BPC will continue the training program at the current level. Unfilled licenses depend on the number of retirements.
Pacific Yacht Mgmt	11	Who is in charge of making sure that all foreign flagged vessels in Washington waters have an exemption or have a pilot onboard?	USCG VTS monitors this closely and reports foreign flagged vessels not taking a pilot to BPC.
Pacific Yacht Mgmt	12	How are fines or penalties assessed to vessels that violate pilotage laws? How is that money used?	The WAC outlines mechanisms for assessing penalties. BPC would work with our AAG in case of a violation. The penalty fees would go into the pilotage account.
Pacific Yacht Mgmt	13	Where does the money from exemptions go? How is it used?	Fees from exemptions go into the pilotage account and are appropriated by the legislature to the BPC's biennial budget.
Pacific Yacht Mgmt	14	Does the BPC have the ability to create a special license for the PSP President & Vice- President that would allow for more pilots but not take away from the President's or Vice-Presidents ability to pilot vessel when needed?	The Board has adopted a statement of policy regarding pilotage duties out of rotation that covers PSPs president. As long as the president engages with the TEC and conducts the required refresher trips, they are able to pilot without the need for a special license. <a href="https://pilotage.wa.gov/policystatements.html">https://pilotage.wa.gov/policystatements.html</a> .
Pacific Yacht Mgmt	15	Would it be in the best interest of the State of Washington to make the pilots employees of the State? Does the State of Washington have the authority to convert the PSP into a state agency?	WA State Legislature could convert pilots to state employees.
Pacific Yacht Mgmt	16	Why do payments for pilotage services get directed to St. Louis? How much money would the PSP save if payments for services rendered was sent directly to the Seattle office?	We are not aware of the arrangement between PSP and the banks they choose to work with. Please direct your question to them.
Pacific Yacht Mgmt	17	What is the PSP doing to improve its reputation with local captains? There is a belief amongst local captains that you can only become a pilot if you personally know or are related to a current pilot? There are many local, and highly qualified captains, who do not apply to take the test because there is this belief that you have to have an inside connection to become accepted within the pilot's association.	Both PSP and BPC have been working strengthen the positive perception about pilotage and to promote the "blind" exam process and transparency surrounding pilotage. Please refer potential candidates to our website.
Pacific Yacht Mgmt	18	Does the dispatcher have the right to say to a vessel "we are booked at 8am but will have a pilot at 9am?"	Yes.
Pacific Yacht Mgmt	19	In 2018, how many delays were caused by the PSP? In 2018, how many delays were caused by the vessel?	PSP has offered to present this information as part of their submittal/presentation regarding the number of pilots.
Pacific Yacht Mgmt	20	What is the definition of a delay?	See the Puget Sound Pilotage District Tariff <a href="https://apps.leg.wa.gov/WAC/default.aspx?cite=363-116-300">https://apps.leg.wa.gov/WAC/default.aspx?cite=363-116-300</a>
Pacific Yacht Mgmt	21	In 2018, how many cancellation fees did the PSP collect? What was the dollar total for cancellation fees collected? What percentage of the total revenue for PSP is made up of cancellation fees?	BPC receives data on what was billed. The annual audit indicates the amount of fees not collected and the number is small.
Pacific Yacht Mgmt	22	Why is the repositioning of a vessel in Lake Union charged an additional \$700.00 surcharge when the vessel did not leave or enter the lake?	PSP is more likely to have an answer to this question.
Pacific Yacht Mgmt	23	How many assignments a year are the PSP President and Vice-President required to take to keep their pilotage license current?	Per the statement of policy regarding pilotage duties out of rotation, "a pilot who is out of regular rotation for a period of twelve months or more, who does not complete at least 12 trips in that same period, shall complete a number of refresher trips prior to resuming full pilotage duties".
Pacific Yacht Mgmt	24	How is it decided if a pilot starts their day in Seattle or out at the PA station?	It is determined by dispatch and type of assignment.

Pacific Yacht Mgmt	25	What is the definition of a cancellation?	<p><i>Per the statement of policy regarding definition of terms, a cancellation is a billable event involving the termination by a carrier (or agent) of a pilotage services request after a pilot has been assigned and before an outbound ship is moved or, in the case of an inbound vessel, the vessel is delayed by more than 6 hours if it occurs within 12 hours of the scheduled arrival time -</i></p> <p><i>i. A cancellation is deemed to occur if a pilot has been assigned and if the service request is cancelled within 12 hours before the scheduled vessel arrival at Port Angeles or, for outbound transits, four (4) hours from scheduled departure from Seattle; five (5) hours from any other port.</i></p> <p><i>ii. Under current procedures, a pilot who has not commenced travel to an outbound assignment at time of cancellation remains available for immediate dispatch. A pilot who has commenced travel is removed from dispatch until rest requirements are met.</i></p> <p><i>iii. An inbound vessel may be charged a cancellation charge for any delay of more than 6 hours of an arrival time made less than 12 hours before the scheduled arrival if the cancellation charge is lower than the delayed arrival charge that would otherwise apply.</i></p>
Pacific Yacht Mgmt	26	While repositioning a pilot, what steps does PSP use to minimize the need for repositioning before the repositioning happens?	<i>Determined by PSP dispatch system.</i>
Pacific Yacht Mgmt	27	Can the BPC create a different kind of license for a pilot who is using comp days before retirement? The license could allow them to use their comp days but only move a vessel in an absolute emergency.	<i>Our understanding is that PSP has changed their operating rules so that licenses will be turned in if a pilot will be using comp days into their official retirement. BPC will look into an emergency licensing option.</i>
Pacific Yacht Mgmt	28	How many dispatchers does the PSP currently employ? What is the succession plan for when they start to retire?	<i>Three. Please direct succession plan question to PSP.</i>
Pacific Yacht Mgmt	29	How does the BPC or the PSP measure the negative economic impact of the pilotage tariffs?	<i>Future tariff changes are the responsibility of the UTC starting July 1, 2019. Please direct questions to the UTC.</i>
Pacific Yacht Mgmt	30	What type of economic impact studies are done before a tariff increase is considered?	<i>Future tariff changes are the responsibility of the UTC starting July 1, 2019. Please direct questions to the UTC.</i>
Pacific Yacht Mgmt	31	How are stakeholders of economic impact studies decided?	<i>Future tariff changes are the responsibility of the UTC starting July 1, 2019. Please direct questions to the UTC.</i>