



STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS

2901 Third Avenue, Suite 500 | Seattle, Washington 98121 | (206) 515-3904 | www.pilotage.wa.gov

Sheri J Tonn
Chair

May 22, 2019

Ned Kiley
Vice Chair

Michael Anthony
Commissioner

Timothy J. Farrell
Commissioner

Eleanor Kirtley
Commissioner

Rik Krombeen
Commissioner

Phil Morrell
Commissioner

John Scragg
Commissioner

Sara Thompson
Commissioner

Captain Mike Moore
Pacific Merchant Shipping Association
World Trade Center
2200 Alaskan Way, Suite 160
Seattle, WA 98121
via email: MMoore@pmsaship.com

Re: Continuation of Q&A Concerning the Number of Pilots in the PS Pilotage District

Dear Captain Moore,

As you may recall, the Q&A session regarding the "number of pilots" submittals between the Board members and PMSA was cut short due to time constraints at the May 16, 2019 meeting. At that time, I informed the Board to provide their additional questions to help inform the next step of the process, which on the BPC-approved timeline is response by interested parties to written submissions, due by EOB June 12, 2019.

For the sake of the process, I encourage you to provide answers to the following Board member's questions as soon as is feasible, and preferably by June 3, 2019:

1. Is it correct that PMSA's request for a decrease in the number of pilots is primarily driven by financial considerations?
2. Has the PMSA recommended an increase in the number of pilots to the BPC in the last 10 years?
3. Does PMSA agree that avoiding delays for vessels awaiting an available pilot is an appropriate goal for the BPC?
4. What is your understanding of "board-on-arrival" service as that term is used by PSP?
5. When you describe the current ordering system for pilots as already being an appointment system, were you suggesting the current system permits pilots to control vessel arrival and departure times?

6. With respect to pilot scheduling, does the PMSA and its members prefer a system that allows the vessel to select its departure or arrival time? Alternatively, would PMSA prefer a system by which pilots pre-determine arrival and departure time slots, leaving vessels to select the next available time?
7. Would PMSA prefer an appointment system that maximizes pilot efficiency by requiring each vessel that misses its scheduled time to re-order a pilot or otherwise move to the end of the queue?
8. Rather than licensing additional pilots, would PMSA prefer that pilots delay vessels when there is no on-duty rested pilot?
9. What safety factors did the PMSA address in its suggestion that the number of pilot licenses should be reduced?
10. What does PMSA consider a "bona fide emergency" as that term is used in PMSA's submission?
11. Would having insufficient pilots to provide service without delays constitute an emergency?
12. If there is always a delay between raising the number of licenses and the time it takes to license a pilot (14-18 months), is there any set of circumstances that constitutes a true emergency?
13. PMSA states in its submission that "PSP report[s] that pilots take two weeks of vacation each year mostly on duty days meaning duty days stood would be 168 and not 182." What/who is the source of that statement what precisely was said by that source?
14. You state that 2018 was an anomalous year and argue it should not have been used in NASA's analysis. What was anomalous about 2018 and how in your opinion would that impact NASA's linear regression analysis?

Please note that additional Board member questions may follow. Thank you for your assistance in this process.

Best regards,

A handwritten signature in blue ink that reads "Sheri J. Tonn". The signature is written in a cursive, flowing style.

Sheri J. Tonn, Chair