

**From:** Mike Moore  
**To:** [Hamel, Jolene \(WSF- Pilotage\)](#)  
**Cc:** [Tonn, Sheri](#); [Bever, Jaimie \(WSF- Pilotage\)](#); [Erickson, Shawna \(WSF- Pilotage\)](#)  
**Subject:** FW: PMSA Fatigue Management Comment Memo  
**Date:** Wednesday, February 20, 2019 5:21:52 PM  
**Attachments:** [PMSA Fatigue Management Comment Memo 081518.pdf](#)

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Please forward to BOPC and FMC,

I am resubmitting the e-mail and memo from August 15, 2018 (below) regarding Fatigue Management. Those communications are relevant to the discussion about setting the number of pilots. Resubmitting will avoid the need to repeat several key points ... and we have two new commissioners.

The facts show a continuation of the decade over decade long-term trend of less and less piloting per pilot, yet PSP submitted a chart indicating that increasing the rest time from 8 hours to 10 would impact approximately 500 assignments (PSP analysis not BPC staff analysis) adding between 1 minute and 1 hour and 59 minutes of rest for each of those incidents. The chart somehow indicated this would equate to adding several more pilots even though the additional rest time in these circumstances would not increase individual pilot workload; the math doesn't support this (see the memo). We have recently even heard discussions of adding up to 10 pilots.

There is no current crisis demanding immediate actions by the BPC. Given the realities of the training queue and retirement announcements, the BPC will be licensing the next several (or more) qualified trainees without delay in order to attain or maintain the current number of pilots set by the BPC.

Therefore, we'd urge a methodical approach that can set a process in place for the benefit of all now and in the future. There is a lot of information in play that needs to be analyzed and understood by all. While pilot (and stakeholder) input is important, we urge that BPC staff or independent third party entities be the primary analytical drivers as opposed to information primarily sourced and analyzed by the pilots (or their consultants).

If there are short-term issues (like medical issues), these should be initially addressed through making dispatch more efficient, improved utilization of existing licensees, good planning, and scheduling with call-backs as appropriate as opposed to making more permanent licensing decisions with longer term implications.

We recommend that the BPC set up a process and timetable that is not rushed and one that requires all the parties to sit down and agree on relevant metrics. We are encouraged the Chair is seeking input on relevant metrics and slowing things down a bit. We are also aware of the pressure from PSP to speed it up.

However, BPC should feel no pressure by the ongoing rulemaking at the WUTC. The Legislature rightfully bifurcated safety and compensation between these two Commissions – and we believe that the BPC's expertise is in safety and making decisions based on facts to enhance safety. BPC should never feel pressured to make any decisions based on tariffs or compensation, as all issues

dealing with those subjects should be focused exclusively on the WUTC. Likewise, all issues dealing with licensing and safety (including the number of pilots) should be focused exclusively at the BPC.

Sincerely,

Mike

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**From:** Hamel, Jolene (WSF- Pilotage) <HamelJ@WSDOT.WA.GOV>

**Sent:** Wednesday, August 15, 2018 2:23 PM

**To:** Bever, Jaimie (WSF- Pilotage) <BeverJ@wsdot.wa.gov>; Erickson, Shawna (WSF- Pilotage) <EricksSh@wsdot.wa.gov>; Hamel, Jolene (WSF- Pilotage) <HamelJ@WSDOT.WA.GOV>; Tonn, Sheri <TonnS@wsdot.wa.gov>; Chuck Adams <cfadams2@aol.com>; Eleanor Kirtley <eleanor.kirtley@green-marine.org>; Grant Stewart <grant.stewart@wsl.com>; Scragg, John <ScraggJ@WSDOT.WA.GOV>; Anthony, Michael <AnthonM@WSDOT.WA.GOV>; Ned Kiley <nedkiley@mac.com>; Phil Morrell <phil.morrell@totemocean.com>; Sara Thompson <sara.thompson@ecy.wa.gov>; Captain Anthony <manthony@pspilots.org>; Captain Carlson <icarlson@pspilots.org>; Captain Scragg <jscragg@pspilots.org>; Captain VonB <president@pspilots.org>; Dr. Paul Darby <pauldarby@chifranciscan.org>; Kirtley, Eleanor <KirtleE@WSDOT.WA.GOV>; Mike Moore <mmoore@pmsaship.com>; Phil Morrell <PMorrell@toteservices.com>; Rick Krombeen <HKrombeen@hollandamericagroup.com>; Sara Thompson <STHO461@ecy.wa.gov>

**Subject:** FW: PMSA Fatigue Management Comment Memo

To the BOPC and FMC,

I am submitting a memo from PMSA regarding fatigue management issues including any proposed RCW language in advance of agency sponsored legislation. Please do not reply to all on this communication as it is not my intent to bypass process rules.

We fully understand the desired to replace the current 7 hour mandatory rest rule language in the RCW however we recommend that any such language essentially set the desired outcome to "ensuring the opportunity for 8 hours of uninterrupted rest between assignments with exceptions defined by the BOPC to include but not be limited to multiple shorter harbor shift assignments and shorter duration cancelation assignments". In addition, there should be more specific language requiring transparent reporting of dispatch data to ensure the BOPC can conduct appropriate oversight; the current language does not accomplish that.

I have participated in the FMC but feel it might be helpful to better document the points I attempted to express several times during the meetings. We believe there is a better approach than leaping to a hard stop RCW standard now. Instead a more flexible route would be to use Board Policy Statements and/or the WAC. Such an approach would allow testing and evaluation of changes. In other words, managing to 10 hours to ensure the opportunity for 8 hours of uninterrupted rest (with exceptions per the BOPC) can be done now without a hard stop in the RCW. The Board can then review implementation and adjust that standard if necessary and validate or change the exceptions.

Regards,

Mike

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Captain Michael Moore  
Vice President  
Pacific Merchant Shipping Association  
World Trade Center, 2200 Alaskan Way, Suite 160  
Seattle, WA 98121  
Office: 206.441.9700  
Mobile: 425.876.2992  
[mmoore@pmsaship.com](mailto:mmoore@pmsaship.com)