

April 25, 2019

Sheri Tonn, Chair
Board of Pilotage Commissioners
2901 Third Avenue, Suite 500
Seattle, WA 98121

RE: Questions and Data/Analysis Requests for Setting Number of Pilots

Dear Chair Tonn,

Thank you for the opportunity to provide the following data requests and questions regarding the setting of number of pilots for the Puget Sound Pilotage District. Over the years, we have requested similar data and have had difficulty getting access. We very much appreciate your providing a process to achieve a better understanding of the data in advance of the Board setting a target level for number of licensed pilots.

Please see the questions and data/analysis requests listed below regarding the Setting of the Number of Pilots and submitted per guidelines set by the BPC. There will be some overlap or duplication with data currently being collected and displayed via staff spreadsheets. We note that data requests/collection is just the first step and that much of what is needed is analyzing the data for trends relevant to workload, dispatch, watchstanding to better evaluate efficiencies/inefficiencies.

We assume staff is collecting and displaying data per the list in WAC 363-116-065 which requires a number “best calculated to optimize the operation of a safe, fully regulated, efficient, and competent pilotage service”. The requirement to optimize sets a high bar and we believe there are many elements in the current operation that should be reviewed and/or improved. We also note that the State of Washington has a workload metric for WSF masters/mates via a negotiation with MM&P and we urge you to compare and contrast PSP with WSF watchstanding, transportation and rest data. Comparing with other maritime (candidate pool sources) and other modes (air, rail, trucking) may be relevant as well.

Below are our specific Data and Analysis Requests:

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 number of pilots.

2. Data to support a regional maritime economic outlook. Request BPC staff present data/graphs/trends on as much of this as they can. PMSA has submitted a regional maritime economic outlook and can work with the ports to do so again to augment staff work on this item.
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.
4. Data to validate compliance with rest requirements before and after the 10-hour policy/rule was implemented.
5. Compare and contrast WSF watchstanding, transportation and rest data as well as relevant comparisons with others in the maritime sector.
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.
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.
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?
9. What is the average (annual) number of pilots available for assignments each day over the past three years.
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?
11. How many times a pilot attending a meeting was taken out of rotation?
12. How many annual assignments over the past 10 years has the President performed? The Vice President?
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
14. Data to support a calculation of average assignment bridge time.

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.
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.
17. Month by month comparison of cancellations over the last three years.
18. Show the daily distribution of assignments to determine trends.
19. How many total duty days occurred without an on-duty pilot performing an assignment?
20. How many days did a pilot perform two or more assignments in a single day over the past three years?
21. How many two-pilots assignments are there per month/year over the last three years?
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?
23. Show the distribution and range of annual assignments per pilot over the last three years.
24. Data summarizing any rest rule violations over 10 years.

We believe that understanding some of the key data points will help both the Board and PSP maximize the safe and efficient utilization of licensed pilots and provide full transparency to shippers. Thank you in advance for your attention to this matter. If you have additional questions, please contact me at (206) 441-9700.

Sincerely,

A handwritten signature in blue ink that reads "MR Moore". The letters are cursive and somewhat stylized.

Captain Mike Moore
Vice President