



From: Master of Towing Vessels Association
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To: USCG/Dept. of Homeland Security

Cc: The Honorable Congressman Don Young
House Transportation Committee
Subcommittee on Coast Guard and Maritime
Transportation.

Cc: The Honorable Senator Ted Stevens
Senate Transportation Committee
Subcommittee on Merchant Marine
Infrastructure, Safety and Security

Concerning the notice of proposed rulemaking;

Docket # 2006-26202, Training Requirements for Mate of Towing Vessels.

As a representative of the 72 members of The Master of Towing Vessels Association, all of which hold a USCG Master of Towing License and currently serve as Captains of tugs in the waters of United States, we would like to express significant concern with the proposed relaxing of training requirements for towing officers.

The USCG training requirements currently in place were crafted after considerable years of study, industry input and public testimony. They are the result of carefully created policy based on safety, responsibility and industry history. These training requirements were only finalized and implemented a mere three years ago. While stringent, they should not be thrown to the wind along with caution, without them having had a chance to work as designed.

The proposed regulation change, as we read it includes the following as written in the Federal Register Volume 72, No 179, Page 52846

If you hold any license as Master of 200 Tons, then you may obtain an endorsement as

MATE OF TOWING VESSELS if:

- # 1. You have operated any vessel for 36 months with license. (ANY VESSEL).
- # 2. You have successfully completed the TOAR checklist. (A CHECKLIST).
- # 3. You have successfully completed the apprentice mate exam. (AN EXAM).
- # 4. (Here is the tugboat part.),

You have 30 days training and observation on towing vessels. (30 DAYS!)

It is not realistic that a senior tugboat captain, towing 40,000 barrels of oil would leave the wheelhouse for 12 hours and let a mate with 30 days on a tug take charge, however, it would be well within the proposed regulations, if they are implemented, and it would undoubtedly happen.

We also have some concern that, should an accident occur involving spilled oil or loss of life, there could be a severe public backlash if it were discovered that the USCG recently lowered the bar for training requirements, and the mate at fault had about 30 days on a tugboat under his belt.

This could easily cause the pendulum to swing in the extreme opposite direction and we could end up with training requirements and regulations stiffer than what we have today.

These USCG regulations were not written, just to be changed when the industry is short by a few people and ready to lobby. There are between 10,000 and 12,000 towing endorsement currently in the U.S., only a small percentage of which are being utilized.

Master of Towing Vessels Association

