

PUBLIC SUBMISSION

As of: September 15, 2008
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Comments Due: September 17,
2007
Late comments are accepted

Docket: [USCG-2006-26202](#)

Training and Service Requirement for Merchant Marine Officers

Comment On: [USCG-2006-26202-0006](#)

Notice of Proposed Rulemaking

Document: [USCG-2006-26202-0011](#)

Wayne C. Jacobs

Submitter Information

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General Comment

I WOULD LIKE YOU TO RETHINK THIS RULE CHANGE.I AM A MASTER OF TOWING ,200-500 ITC NEAR COASTAL WORKIN IN THE ICWW.I AM ALSO A DESIGNATED EXAMINER' I THINK THESE CHANGES WOULD NOT BE TO THE GOOD OF THE IND.BECAUSE YOU WOULD NOT HAVE THE PROPER TRAINING WITH THE TOWS AND MOUTHER NATURE.WE HAVE TO DEAL WITH THE ELEMENTS THAT MOUTHER NATURE THROWS AT US EVERY DAY.THE STEERS MAN THAT WE HAVE AT PREASENT ARE GETTING SOME GOOD TRAINING WITH A MASTER BEHIND THEM AND ARE BECOMING GOOD WHEELMAN.BY SHORTING THE TIME I FEEL THEY WILL NOT GET THE SAME TRAINING.AS FOR THE 200 NEAR COASTAL THEY SHOULD HAVE TO GO THROUGH A TRAINING PERIOD.WE HAVE HAD LESS ACC. SENCE THE LIC. HAVE BEEN CHANGED UP TO PREASENT.I DO KNOW THAT THE COMP. ARE BLD.NEW BOATS AND NEED THE PERSONAL BUT DO WE NEED THEM AT THE EXPENCE OF ACC.I DO NOT THINK SO.THESE CHANGES WOULD NOT BE FAIR TO THE PILOTS THAT HAVE GONE,OR GOING THROUH THE STEERSMAM PROGRAMS.WE ARE TURNING OUT

SOME GOOD WHEELMAN NOW THAT THEY ARE GETTING TRAINING FROM
OUR CLOSE CALLS THAT WE CAN PASS ON TO THEM TO HELP THEM
FROM NOT HAVING THEM.

THANK YOU, WAYNE JACOBS