

# PUBLIC SUBMISSION

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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-2006-26202-0017](#)

Joel N. Milton

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## Submitter Information

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## General Comment

I have attached my comments on the Coast Guard's NPRM for Training and Service Requirements for Merchant Marine Officers, docket number USCG-2006-26202.

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## Attachments

[USCG-2006-26202-0017.1](#) Joel N. Milton

**Joel Milton**

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December 17, 2007

U.S. Coast Guard  
Docket Number USCG-2006-26202  
Training and Service Requirements for  
Merchant Marine Officers

To whom it may concern,

I have several concerns regarding the reduction of the standards for deck officers serving aboard towing vessels that are contained in this proposed rule. I am referring specifically to the proposal that would allow a Master of Steam or Motor Vessels of not more than 200 G.R.T. to serve as a mate of towing vessels after a mere thirty days of service aboard tow-ing vessels. If this proposal is enacted into the existing regulations it will eventually result in a net decrease of the quality of officers serving aboard towing vessels by lowering the minimum experience requirements. This will almost certainly result in a concurrent decrease in marine safety.

In the *Benefits* paragraph of the Alternate Progression proposal it states that *“Candidates eligible for a license as mate (pilot) of towing vessels under this proposed rule change would, in fact, have the same level of knowledge as those seeking a license as master of towing vessels because they would be required to pass the same apprentice mate exam. In addition, such a candidate would have already served approximately five years (sixty months) as a licensed officer before receiving the endorsement. This period is twice as long as the Coast Guard currently requires for candidates seeking a license as a mate (pilot) of towing vessels under the first progression. The second progression already allows mariners holding a license as a mate or first-class pilot of inspected, selfpropelled vessels greater than 200 GRT to operate towing vessels on a route if they complete a TOAR as well as 30 days of training and observation on towing vessels on the desired route. The alternate progression element of the proposed rule would extend similar flexibility to a sufficiently experienced master of steam or motor vessels not more than 200 GRT.”*

To start with, the statement that the candidate would have approximately five years of experience as a **licensed officer** is factually incorrect. In **46 CFR 10.426** the sea time requirement for Master <200 GRT N/C is 720 total days (360 as master or mate while holding a license), and in **46 CFR 10.428** the sea time requirement for Master <100 GRT N/C is 720 total days (0 as master/mate). In the **Discussion of Proposed Rule - Section (3) Alternate Progression** it states that *“the master of steam or motor vessels not more than 200 GRT would need three years as service as master of steam or motor vessels not more than 200 GRT.”* So by adding this proposed requirement of three years of service to the already required one year as master for the Master <200 GRT licenseholder a final total of as little as **4 years** experience on the license is what I come up with. In the case of the Master <100 GRT license-holders they could have as little as **3 years** of total experience on their license. This amounts to a potential reduction in the actual sea time of these candidates for the *Mate of Towing Vessels* endorsement of as

much as **20%** and **40%**, respectively, from the **5-year total** cited in the proposed rule. This is significant. It is also highly probable that the vast majority of the candidates will come from the ranks of <100 GRT masters, so the lower of the two experience levels would likely be dominant. Furthermore, and most important of all, only **30 days** of this total would have to have been served aboard towing vessels.

Thirty days of training and observation is, by any fair and honest measure, insufficient as a minimum requirement of experience, and I would also argue that it is insufficient **regardless** of whether the candidate is the holder of a six-pack license or a Master - Unlimited upon Oceans. The exception that was made for the holders of <500 GRT-and-up licenses back when the towing vessel officer requirements were written should not have been. From a practical standpoint, anyone who presents a completed TOAR with only 30 days of experience is making, at best, a highly questionable claim and it should immediately arouse the suspicion of a competent license evaluator. At a bare minimum, not less than **6 months** would be a good place to consider setting the minimum experience requirement. My own experiences have taught me that, on average, about six to nine months would probably work reasonably well for *most* candidates who had at least two or three years of previous experience **operating** commercial work boats of one variety or another. There are surely a very exceptional few that could probably do it quicker and with no reduction in safety. But they are just that, few in number. While it's true that someone going through the apprentice mate route of advancement could potentially have a total of only 2½ years of sea time when they became eligible to advance to mate, in most cases all of that time will have been gained on towing vessels. In addition, 1 year *must* have been spent as an apprentice mate. I also believe that relatively few people are actually ready to take and pass the apprentice mate written exam after only 1½ years on the job, so it is likely that most who go this route will have even more experience than the minimum. It is a mistake to minimize the importance and necessity of the good, sound education that can only be gained from working on the deck of a tug or towboat.

In general, poor or inexperienced deck hands make for poor mates or pilots and, eventually, captains. Those who've never decked at all are highly unlikely to ever amount to much in the wheelhouse of a tug. They are a danger to both their crew, other vessels and the general public.

In addition, because there is no minimum standard for what **type** of experience would be accepted, candidates who earned their licenses with sea time gained on charter fishing vessels, party boats, dinner yachts, tour boats, private yachts and other types of small passenger vessels would qualify for the towing endorsement under this proposed rule. This kind of experience generally bears little relevance to what we do, nor does it necessarily transfer over readily to the dangerous and rather specialized world of the tug and barge industry, particularly on the still-dominant conventional wire boats. And there are also a few hawser boats still in operation, which require even greater skill yet to operate safely. It depends on the quality, not just the quantity, of the experience that the

individual trainee brings to the table and that is something best judged by the person conducting the actual training and evaluation on board the towing vessel. It also takes time. I would agree with the argument that, if there exists a group of experienced captains that have the potential to be able to lateral over into the towing industry with relatively minimal adjustment needed, the source would be the crewboat and offshore supply vessel fleets from the oil fields. Sea time gained in this environment should definitely be given far more weight than that of any of the other categories. Nevertheless, except in the most exceptional of cases, 30 days is still far too little time. Perhaps *90-120 days* would be a suitable minimum training and evaluation period for this category of candidates. The vast majority of wheelhouse personnel on towing vessels in 24-hour service stand a two-watch system. This, by its very nature, demands that both the mate / pilot and master be able to hold down their own watches without each others assistance, except in the event of an **emergency**, or else they will be operating in violation of the maximum work hour rules and will become dangerously fatigued quite rapidly. Rounding up on a barge to pick it up alongside is not an emergency, it's a **routine maneuver**. So is making and breaking tow. As are entering port, landing a barge at a terminal, and navigating in reduced visibility or in congested waterways. They happen all the time. These are not things that a mate should normally ever have to interrupt a captain's legally mandated rest periods (which are themselves inadequate already) to accomplish safely. In fact, the manning regulations at **46 CFR 15.705** expressly prohibit it. To put it simply, for this system to work safely the mates must themselves possess minimum captain-level abilities to avoid unduly burdening the captains. However, if these newly endorsed towing vessel mates were put into a two-watch system (splitting the regular watches between a fully-qualified and experienced Chief Mate & a trainee 2nd Mate) where the captain didn't stand a normal watch and could adjust his schedule as needed to observe and train the 2nd Mates, it would be a different matter altogether. Under such a watch system adequate safety would be maintained while the new mate learned on the job and got a suitable amount of real-world experience. It would also take the pressure off the *Designated Examiner-certified* captains to sign off the TOARS as quickly as possible, which will otherwise undoubtedly become an additional problem. I do agree that those who choose to attend an approved course for apprentice mate should be given credit towards the minimum sea service requirement just as those working towards other licenses are. But anything more than day-for-day credit would be overly generous and not in the best interests of safety. Many courses generally amount to little more than license exam preparation and are geared primarily towards rote memorization so that individuals may correctly answer the multiple-choice questions.

This is hardly a viable substitute for real boots-on-the-deck experience and on-the-job training from veteran mariners. Unless the Coast Guard intends to truly strengthen the academic standards of such courses (and require high-quality, realistic practical exercises to go along with it) then it would be unwise to substitute class time for sea time at

anything more than a 1:1 ratio. It would also be unfair to all self-studying hawespipers, who possess at least the same minimum level of book knowledge after passing their Coast Guard-administered exam as those who attend a course instead, but must still meet the full minimum service requirement.

Sincerely,  
Capt. Joel Milton  
Master of Towing Vessels  
Master of Steam & Motor Vessels <1,600 G.R.T.  
Able Seaman - Unlimited  
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