

PUBLIC SUBMISSION

As of: September 17, 2008
Tracking No. 803a36c4
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-2006-26202-0019](#)

Captain Darren S. LaPierre

Submitter Information

Name: Darren S LaPierre

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General Comment

Comments attached.

Attachments

[USCG-2006-26202-0019.1](#) Captain Darren S. LaPierre

Captain Darren S. LaPierre

PO Box 24, Destin, Florida 32540

January 27, 2008

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

To whom it may concern,

I am concerned regarding the reduction of the standards for deck officers serving aboard towing vessels that are contained in this proposed rule. 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 towing vessels. If this proposal is enacted into the existing regulations it will result in a decrease of the quality of officers serving aboard towing vessels by lowering the minimum experience requirements. This will certainly result in a decrease in marine safety and just as certainly result in an accident which, if involving a petroleum barge, could also result in an environmental disaster. You need to consider that you are proposing to change the standards for “towing” not only sand and gravel barges but also chemical and petroleum barges carrying millions of gallons of hazardous cargo. This proposal stands to help only one thing, alleviate the personnel shortage, but it will do so at the expense of safety. The notion that this proposal will not compromise safety is misguided. You are setting the stage for disaster and if you proceed on this course you will be re-visiting this while be questioned at the resulting NTSB and congressional hearings that will surely follow a major marine accident/environmental disaster involving a petroleum barge. You should be restricting and increasing the requirements for Masters and Mates of towing vessels, not making it easier for unqualified mariners to be hired for positions they are not qualified to serve in.

I am a “Designated Examiner” and I can assure you that anyone who completes a TOAR in only 30 days is getting it pencil whipped, it is simply not possible regardless of the candidate’s previous experience!

The solution to the personnel shortage should not come at the expenses of safety as a result of “making it easier”. Please reconsider this proposal with what is right and safe, not what will alleviate the personnel shortage.

Sincerely,

Captain Darren S. LaPierre
Master of Steam or Motor Vessels, 1600 GRT. Master of Towing Vessels