

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-2006-26202-0021](#)

Captain G. Koshland

Submitter Information

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General Comment

Captain G. Koshland

Cold Brook, NY

Response: To Proposed rulemaking docket USCG-2006-26202
Training and service requirements.

To whom this may concern,

This proposal for the reduction of standards of deck officers on towing vessels, poses possible catastrophic safety and environmental concerns for the towing industry and the general public. Yes, it would help ease the personnel shortage in the industry at an extreme risk of future accidents that would be the direct result of this rule making and in my opinion this risk is not acceptable.

There is no simple time fix to this issue. The oil and chemical towing industry is moving in a direction of double hulled, articulated tug and barge (ATB) units and towing endorsement is still required aboard this type of unit for emergency towing situations with good reason. The towing industry today is all about operating as safely as possible and safety is not taken lightly or just a buzz word. We live it everyday, it's a responsibility that mariners and towing companies must live by in today's world. The proposal of 30 days is not a long enough period of time unless you practiced just towing transitions everyday for that time period and we all know that can't happen in the real towing world. The Maritime Schools are making an attempt to turn out qualified towing vessel credentialed mates using small tugs and small barges teaching the mechanics of transition maneuvers. However in the real world, size does matter! The delicate dance of large river tows and tow wire transition, small falls way short on the physics and dynamics of river navigation and tow wire transition with large jumbo offshore barges. To say a graduate is qualified to sign on a large river tow or tow wire boat is a great dream, most can barely handle a light tug boat without tearing down docks.

In my opinion a better approach would be to have a designation in the industry as a second mate(not a cargo mate) without having to have the towing vessel endorsement and serve one calendar year on a towing vessel and out of that year, 90 days of actual (1 for 1) sea service must be on a vessel that is actually a conventional towing vessel not an ATB unit and have his TOAR assessment signed off by the seasoned captain minimum 3rd issue (meaning having a minimum 10 years experience) of that type vessel (not necessarily a designated examiner) but following all the TOAR criteria . This would certainly help things move along in the industry. In the real world some of the senior most experienced Masters are not interested in Designated Examiner status. The possibility of having to defend themselves, with no president cases, after they have signed someone's TOAR, post incident, years later is certainly not worth the liability in a lot of eyes, that could be quite costly.

Respectfully yours;

Captain G.Koshland

Attachments

[USCG-2006-26202-0021.1](#) Captain G. Koshland