

# PUBLIC SUBMISSION

As of: September 17, 2008  
Tracking No. 803d98b6  
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-2006-26202-0022](#)

Patrick T. Folan

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## Submitter Information

**Name:** Patrick T Folan

**Address:**

49 Welwyn Circle  
Tonawanda, NY, 14223

**Submitter's Representative:** Hillary Rodham Clinton

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## General Comment

Captain Pat Folan

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## Attachments

[USCG-2006-26202-0022.1](#) Patrick T. Folan

February 20, 2008

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

RE: Concerning the notice of proposed rulemaking;  
Docket # 2006-26202, Training Requirements for Mate of Towing Vessels.

Dear Sir/Madam;

I am a Designated Examiner for Towing Vessel Operator Assessments and also a tug captain with more than 21 years of experience as a licensed mariner. I have watched the towing industry evolve and become a safer, better place to work. Normally I do not support a lot of government interference into private industry, but I was also the owner of a towing company (Intracoastal Transportation, Inc) and the current regulations regarding the path to the wheelhouse on towing vessels are a much needed set of rules. Prior to these regulations, anyone with a license could run a tug/towboat, but finally we have a career path for the industry that reflects the complexity of the job. As it stands now, the mariner working his/her way to the wheelhouse has to perform on the job and pass not only a written test (which allows him/her to steer a tug), but also a 77 point practical exam in front of a Designated Examiner to become a mate on towing vessels. The next step to master requires more time on a towing vessel under a master. I strongly urge you to keep this program in place. It forces the mariner to show competency.

I do not believe that 30 days is enough time to learn how to operate a towing vessel and her barge(s). The towing industry is highly specialized and the average mariner coming from a supply boat/charter boat/ferry etc will not be able to pick up the skills necessary in 30 days to safely operate a tug/towboat much less complete the Towing Officers Assessment Record (TOAR). It is unrealistic for the mariner and the companies, and it will foster an environment in which accidents will become more prevalent.

The US Coast Guard does not have a practical view of what we do in the towing industry and rely on a Towing Safety Advisory Committee for their recommendations. The committee has a noticeable absence of licensed, working mariners. The AWO, an industry lobby, appears to be the driving force behind the rule change in order to reduce the manning shortage on member vessels. As a towing company owner, I can tell you that the reasons for the manning shortage go well beyond just increased license requirements. But, I would always want the most qualified people in my wheelhouse, not someone who took a shortcut and doesn't have the skills necessary to protect his crew and vessel or safe guard my client's cargo, barge and public safety.

These training requirements were only finalized and implemented three years ago and I ask you to give them a chance to work as designed.

Thank you.

Sincerely,  
Captain Patrick Folan