

PUBLIC SUBMISSION

As of: September 16, 2008
Tracking No. 80540c4b
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-2006-26202-0023](#)

Captain William E. Brucato

Submitter Information

Address: XX,

Submitter's Representative: Reinauer Transportation Co.

Organization: Captain William E. Brucato

General Comment

Please see the attachments

Attachments

[USCG-2006-26202-0023](#) Captain William E. Brucato

5/1/08

To: USCG/Dept. of Homeland Security

Cc: The Honorable Congressman Don Young

House Transportation Committee Subcommittee on Coast Guard and Maritime
Subcommittee on Merchant Marine Transportation.

CC. The Honorable Senator Ted Stevens

Senate Transportation Committee

Infrastructure, Safety and Security

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

Dear Sir/Madam;

As a professional mariner and Designated examiner I take issue with the proposed “30 day wonder” program of proposals for relaxing the standards for acquiring a “Mate of Towing Vessels” endorsement. I am stunned that there would be so little thought given to the reality of what is necessary to safely operate a towing vessel on this nation’s waterways. For my part, you will not see my signature affixed to any such candidate’s documents without a great deal more time on the job, doing the job.

The mere thought of someone with so little practical experience earning an endorsement in so short a time, and then be in charge of a loaded tow, gives me great cause to be alarmed.

I started in this industry since 1973 and have welcomed the technological improvements and progress made in the time I have served aboard towing vessels. I “decked” for 3 years before I was allowed to train in the wheelhouse with good reason. A mate candidate needs a thorough knowledge of deck operations in order to supervise his deck gang and understand the job.

I defy anyone to find someone who can claim to (and actually) be qualified to steer a tug or towboat after just 30 days of mostly classroom time. It does not even come close to reality.

The system that presently exists is more than adequate to meet the needs of all concerned since it requires a true apprenticeship. I believe that in order to guarantee the next generation of mariners is safer and more skilled we need to maintain the present standard and follow the tried and true methods that suited us so well in the past. A quicker route to the endorsement is a guaranteed recipe for an environmental/human disaster. We wouldn’t dream of sending a 45 million dollar fighter jet into battle with a student pilot, or would we?

Captain William E. Brucato
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