

PUBLIC SUBMISSION

As of: September 15, 2008
Tracking No. 80542e52
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-2006-26202-0024](#)

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Submitter Information

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General Comment

I am a Designated Examiner and hold a license as Master of Towing Vessels and Master of Steam and Motor Vessels, 1600 Gross Tons, Near Coastal Waters, and got my original seaman's card in 1973, and have worked in every capacity in the deck department on inland and coastwise tugboats, and presently steer for one of the East Coast's largest tug and barge companies.

I thought that the recent changes to the licensing structure, creating the Master and Mate of Towing licenses and establishing a three year sea time requirement came close to reflecting the realities of this business. It is inconceivable to me that anyone, regardless of intelligence, aptitude or ability, can learn the job well enough with thirty days of sea time, regardless of classroom or other non-sea-time training.

I learned to deck, then learned to steer, over several years, learning from a variety of people with different concentrations of experience. Towing

evolutions can be done in a number of different ways, and usually there is an advantage to one or another depending upon the circumstances. A license candidate not only needs to experience and practice the different ways of doing things, but also have the experience to recognize which one will work best, or not work at all, in different circumstances.

Another factor is that this work goes on year-round, and weather and seasonal changes have a big effect on operations and how best and most safely to accomplish them. One does not experience much change of seasons in thirty days.

In fact, one does not experience much, compared to the sum of knowledge and experience required to do this job at even a minimally acceptable level of competence and safety.

There is a shortage of qualified personnel, which developed over the past twenty years and which cannot be cured in thirty days. What is needed is a long-term improvement in wages, benefits and working conditions, and I am glad to say that my employer is one of the leading companies in this regard. The others should follow suit.

James Michael Forsyth