

PUBLIC SUBMISSION

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Comments Due: September 17,
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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-2006-26202-0025](#)

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General Comment

Please allow me to weigh in on uscg-2006-26202

Regarding the proposal to remove radar observer endorsements from the uscg license. My concern is where they go, as they currently appear on no other uscg issued document. Does an unverifiable school issued document now become another paper I must carry with me and pray never to lose or have stolen? Perhaps a better solution is to list all certificates and endorsements on one uscg issued paper (a license) and synchronize the expiration dates. Instead of a one time opportunity to synchronize the expiration dates, simply always synchronize the expiration dates. My master's license, radar observer and stcw all expire at different times even though I am in the industry for fifteen years.

Regarding an alternate path for mates of tow to enter the industry. I am wholesaley opposed to this on broad terms. Off-watch masters should not be asked to bear the liability of licensed mates legally standing a watch yet operating under the master's license. This is a mater's catch 22 of the most

onerous sort.

If the coast guard is willing to license a mate to stand a wheelhouse watch and a company can therefore hire him as such; a master should not be held liable for the actions of the mate as though they were his own. This entire issue should be revisited with an eye toward protecting the license and reputation of existing masters. A fast tracked mate should not be responsible for a tow 12 hours a day and in essence operate as a limited liability master.

Thank you for hearing my comments.