

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-2006-26202-0026](#)

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General Comment

DEAR SIR OR MADAM,

THESE THOUGHTS ARE IN REFERENCE TO THE PROPOSED RULE IN DOCKET #USCG-206-26202. IF YOU HAD A CHARTER BOAT OWNER TRAINING A NEW CAP-TAIN WITH JUST 30 DAYS EXPERIENCE WOULD HE FEEL THAT THE TRAINEE WOULD BE UP TO THE TASK? WOULD THE NEW CAPTAIN BE ABLE TO FIND A WRECK, ANCHOR ON THE WRECK (POSSIBLY USING 2 ANCHORS), OR SET A DRIFT, KNOW WHERE TO GO, WHATEVER IS NECESSARY TO GIVE THE CUSTOMERS A GOOD DAYS FISHING? IF IT WERE A NICE WEEKEND DAY WITH A LOT OF CUSTOMERS ABOARD I THINK THAT THE BOAT OWNER MIGHT HAVE SOME SECOND THOUGHTS. IN ANY CASE, THE WORST THING WOULD BE THAT THERE WERE NO FISH CAUGHT AND THE CUSTOMERS MIGHT NOT RETURN.

NOW THE U.S.C.G. SAYS THAT 30 DAYS OF TRAINING AND

EXPERIENCE (AND A SIGNED TOAR) IS SUFFICIENT TO RUN A TOWING VESSEL AS MATE WITH NO PRIOR EXPERIENCE IN THE INDUSTRY AT ALL. A MATE MUST BE ABLE TO SAIL AND LAND LOADED OR LIGHT BARGES, PUT THE BARGE ON A TOW WIRE OR HAWSER, BE ABLE TO PICK THE BARGE BACK UP OFF THE WIRE OR HAWSER, AN-CHOR AND DE-ANCHOR, ETC. IN ALL WEATHER CONDITIONS. THERE ARE MANY DIFFERENT KINDS OF TOWS AND EACH ONE IS UNIQUE IN THE WAY YOU MAKE UP TO THEM. BE IT AN OIL BARGE, SAND SCOW, CRANE BARGE, RAILROAD BARGE, MULTIPLE BARGE TOW, EACH ONE HAS ITS OWN CHARACTERISTICS. AND HOW DOES THE U.S.C.G. PLAN TO ANSWER THE QUESTION OF PILOTAGE AND RECENCY? IT????????S VIRTUALLY IMPOSSIBLE TO GET 12 ROUND TRIPS, SOME AT NIGHT, IN JUST 30 DAYS. HERE ON THE EAST COAST THE MATE IS REQUIRED TO BE ABLE TO DO ALL THE JOBS GIVEN HIM OR HER WITHOUT WAKING THE CAPTAIN FOR ADVICE.

UNLIKE A CHARTER BOAT, THE WORST CASE SCENARIO HERE LIKELY INVOLVES OIL IN THE WATER, MAYBE A LOT OF IT, AND EVERYONE KNOWS THE RESULTS OF AN OIL SPILL. AS A U.S.C.G.-CERTIFIED DESIGNATED EXMANIER I FIND IT HARD TO UNDERSTAND WHY THERE SEEMS TO BE THE NEED FOR THIS FAST TRACK! THERE IS NO GETTING AROUND THE FACT THAT THE MORE TIME YOU HAVE ON DECK (AS A DECKHAND) THE MORE EXPERIENCE YOU WILL GAIN. WITH EACH DIFFERENT JOB YOU GAIN MORE AND MORE VALUABLE EXPERIENCE. THERE IS AN OLD SAYING THAT YOU CAN????????T BE ON THE SECOND DECK GIVING ORDERS WHEN YOU WERE NEVER ON THE MAIN DECK TO RECEIVE THEM! MY OPINION COMES FROM HAVING EIGHTEEN YEARS EXPERIENCE AT STEERING TUGS, AND 7 YEARS ON DECK PRIOR TO THAT.

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1,600 G.R.T. MASTER & MASTER OF TOWING VESSELS

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