

# 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-2006-26202-0027](#)

Daniel F. McCoart

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## Submitter Information

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## General Comment

Please see the attachments

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## Attachments

[USCG-2006-26202-0027](#)

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May 28, 2008

US Coast Guard

## Training and Service Requirements for Merchant Marine officers

Sirs:

Regarding the above proposed changes. There is no doubt in my mind that marine towing vessel safety will be severely compromised. The marine towing industry is a highly specialized one. A licensed officer with no towing experience cannot just happen on to the scene so to speak and expect to do the job safely. Piloting a charter boat, commercial ferry or dinner cruise boat in no way even remotely qualifies one to be able handle a commercial towing vessel. As a designated examiner I witness and help train already licenced officers all the time. Fishing vessel Captains, maritime academy graduates and yes even licensed officers with towing endorsement credentials. There is no marine towing company I am aware of that does not carefully evaluate all wheelhouse personnel regardless of past experience or stated job competency, usually on several different company vessels, under several different Captains and Mates.

Officers with past towing experience are one thing. Officers with no towing experience are quite a different matter. There is no way, I repeat no way, a person, regardless of ability can just step into the job and be able to do it safely in just thirty days. The proposal is ridiculous and goes against the very stringent regulations currently in effect.

Most vessels operate on a two-watch system which demands that both the Captain and the Mate be competent in all aspects and vessel handling maneuvers. Vessel and crew safety demand nothing less. This proposal says nothing of the **type** of previous experience required. The shortage of qualified towing officers may be somewhat do to current stringent regulation requirements but easing those requirements is the wrong answer in my book and will most certainly result in compromised industry wide safety and an increase in the scope and frequency of accidents. The Coast Guard needs to step up to the plate here and realize a paper fix is not the answer. The Companies themselves need to realize that in order to solve their manning issues they need to attract young competent people by offering career

opportunities more in line with shore side professionals. Both entities need to realize actual sea time, time on board doing the job under proper supervision is the key here.

Thank you for your time,

Captain Daniel F. McCoart  
Master of Towing Vessels  
Master of Steam and Motor Vessels <1,600 G.R.T.  
Able Seaman Unlimited  
License # 1136370  
United States Coast Guard Designated Examiner