

PUBLIC SUBMISSION

As of: September 15, 2008
Tracking No. 8066de5b
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-2006-26202-0029](#)

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Submitter Information

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General Comment

To whom it may concern,

As a master of towing vessels pulling 80,000 bbl barges I can assure you that the knowledge required to do it safely does not come from an Apprentice Mate Exam, a "Coast Guard Approved" class, or a magic lantern. It can only be aquired onboard said type of vessel and it cannot be aquired in 30 days. Turning loose a 30 day mate as officer of the watch on a tug moving oil would be, in my opinion, like driving your car while drunk. You might get away with it for a short time but sooner than later it will cost you dearly. The notion that safety would not be jeopardized by such a proposal is sadly and grossly misguided.

Captain Eric Forney