

# PUBLIC SUBMISSION

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Comments Due: May 22, 2006

Late comments are accepted

**Docket:** [USCG-2006-24371](#)

Consolidation of Merchant Mariner Qualification Credentials

**Comment On:** [USCG-2006-24371-0001](#)

Notice of Proposed Rulemaking (NPRM)

**Document:** [USCG-2006-24371-0278](#)

John X. Kauffman

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## Submitter Information

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**Submitter's Representative:** Delahunt

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## General Comment

Please see the attachments

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Attachments USCG comments regarding Mariner licensing qualifications.

To:

USCG Docket # USCG-2006-26202

The Honorable Congressman Don Young

House Transportation Committee Subcommittee on Coast Guard and Maritime

Subcommittee on Merchant Marine Transportation.

CC. The Honorable Senator Ted Stevens

Senate Transportation Committee

Infrastructure, Safety and Security

CC. The Honorable Congressman William Delahunt

10th district, Massachusetts.

CC. The Honorable State Representative Jeffery Davis Perry

5th Barnstable district Massachusetts

Comment Officer:

Now that several years have passed, since the 'new' license guidelines have been implemented, a shortage of qualified mariners is being used as a 'need' to excoriate the current license development program.

I am of the firm belief that the industry is only now recovering from the "black eye" of the past towing vessel accidents, and relaxing the requirements WILL allow a new round of minimally under qualified operators into the industry.

The Exxon Valdez incident showed both the need, and started the whole random drug and alcohol testing process. If the industry was upset at the cost or if there was a perception that testing was reducing the pool of qualified applicants would the USCG seriously consider dropping a higher standard of testing just to appease the industry? (I would hope not!)

Several years ago a towboat ran into the Amtrak bridge in Louisiana. Since then, there have been several more recent incidents regarding tows, groundings, allisions, collisions, and foundering. (Ohio river bridge allision, C&D Canal tripping, Buzzards Bay grounding, Louisiana coast allision, to name a few.) These few examples cost several lives, millions of dollars in damage, and millions and millions of dollars in Oil spill remediation.

As a result, these actions promulgated several TSACS, and NPRM's to make changes in the way towing vessel licenses were approved, issued and the license progression was made to follow actual towing vessel experience and tonnage/HP guidelines. ALL agreed that potential towing vessel operators needed more time to sufficiently learn the towing industry, while ONBOARD tugs. However; This new proposal is simply trying to do an 'end run' around the current regulations and will put inexperienced untrained operators in command of towing vessels. Thirty days of 'training' is NOT enough time to show even a spectacularly competent, and able boat operator how to make, break, and tow. This is not even to bring up the different conditions in industry specific areas, with regard to special towing types, styles, and makeups.

A towboat operator may be quite qualified to tow barges in the inland waterways, but take the same individual and place them on a harbor assist tug, and they will be like a 'fish out of water.' Similarly, the same harbor assist tug operator would be totally unprepared to tow an inland river tow, or do anchor handling in the Gulf of Mexico.

As these examples show, ALL these operators need time to learn the job. BUT, an operator coming in to the towing industry from outside (yachts, fishing, or ships) is ill prepared to operate a towing vessel and needs more time to acclimate. (Although there may be SOME who can transition easily, and with little (minimal) time to need to learn, how about the 'average Joe' who takes more time to learn? Where do the standards lie? It appears the industry wants to have the minimum, easiest amount of training as the 'bar'

for standards. This is wrong to allow the minimum standards to be so lax as to allow too little time for even a good operator to matriculate up the system.

My 35 years in the commercial industry, and 27 years in the towing industry is indicative of the time I have invested in this career. To 'water it down' and make it so easy for people to transfer laterally into this industry for the companies convenience is to totally ignore the reasons the USCG implemented more stringent regulations in the first place. The time has come to STOP the easing of the regulations for the companies benefit.

Have you heard of this saying?

“Lack of planning on your part does NOT constitute an emergency on MY part.”

This means that the industry has had several years to start, or look for ways to have fully trained applicants. BUT, now that there is a shortage of operators, it should not mean a lowering of standards because of lack of foresight from the industry. This 'new' licensing standard has not 'snuck up' on the industry, it has been in place for several years. Just because the industry has chosen to ignore the coming labor shortfall, it should not justify the cry to lower standards.

Unfortunately the industry is crying wolf because of a labor shortage. This cry from the companies, and the towing vessel organizations should NOT be the reason to lower these standards. Remember that these higher standards were implemented because these same organizations were NOT capable of vetting their own members and employees to ensure competence and experience. Only with higher standards and training can the towing industry show a professional level of competence.

Sincerely,

Captain John Kauffman

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Master 1600NC, FCP, Boston, Cape Cod Canal, Buzzards Bay, Ma. State pilot, MTV,  
USCG DE.

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