

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice
DOCKET:	TP-190976		President, PMSA
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 158:

Produce all documents supporting or establishing that an increase in callbacks is caused by an increase in revenue per assignment. MM-01, p. 62.

PMSA RESPONSE TO PSP DATA REQUEST NO. 158:

Objection: This Data Request seeks information that is already available to PSP in its internal documents.

Subject to and without waiving said objections, PMSA answers as follows:

This Data Request mischaracterizes Capt. Moore's testimony on page 62, which identified a strong correlation between an increase in revenue per assignment and callbacks, as illustrated in Figure DD, and as based on PSP Reply to UTC DR74 and Exh. MM-16. If there is specific data or documents which confirm and/or establish conclusively the correlation between the increase in callbacks and the increase in revenue per assignment, such data would be in the possession of PSP and has not been provided to PMSA. PMSA must rely on the data published by the BPC in their Annual Report and the Board's regularly updated spreadsheets and otherwise disclosed by PSP in this and other proceedings.