



March 15, 2023

Chair Sheri Tonn
Washington State Board of Pilotage Commissioners
2901 Third Ave., Ste. 500
Seattle, WA 98121

Re: Updated Concerns Regarded Needed Efficiency Improvements in Puget Sound Pilotage

Dear Chair Tonn:

PMSA fully supports and encourages the provision of a safe and efficient pilotage service for vessels calling on the Puget Sound. At present, efficiency improvements are necessary to support and enhance the pilotage safety regime regulated by the Board of Pilotage Commissioners (BPC). We provide these comments as an update to our numerous past submissions, including our January 2022 letter (attached), which included many recommendations on how to address this subject.

For the current pilotage regime to work well it requires effective management of pilots and pilot resources by the Puget Sound Pilots (PSP) with mandated state oversight that includes a focus on both safety and efficiency by BPC. RCW 88.16.035(1)(d) requires that when determining the number of pilot licenses that the BPC ***“optimize the operation of a safe, fully regulated, efficient, and competent pilotage service.”***

You Can’t Manage What You Don’t Measure

PMSA remains committed to working with BPC and PSP on how best to determine which key performance indicators (KPI’s) will be used to measure efficiency so we can all be provided with the same data and be on the same page when evaluating issues and setting up new management tools. This is a critical first step necessary for BPC to implement in order to achieve full implementation of the Pilotage Act.

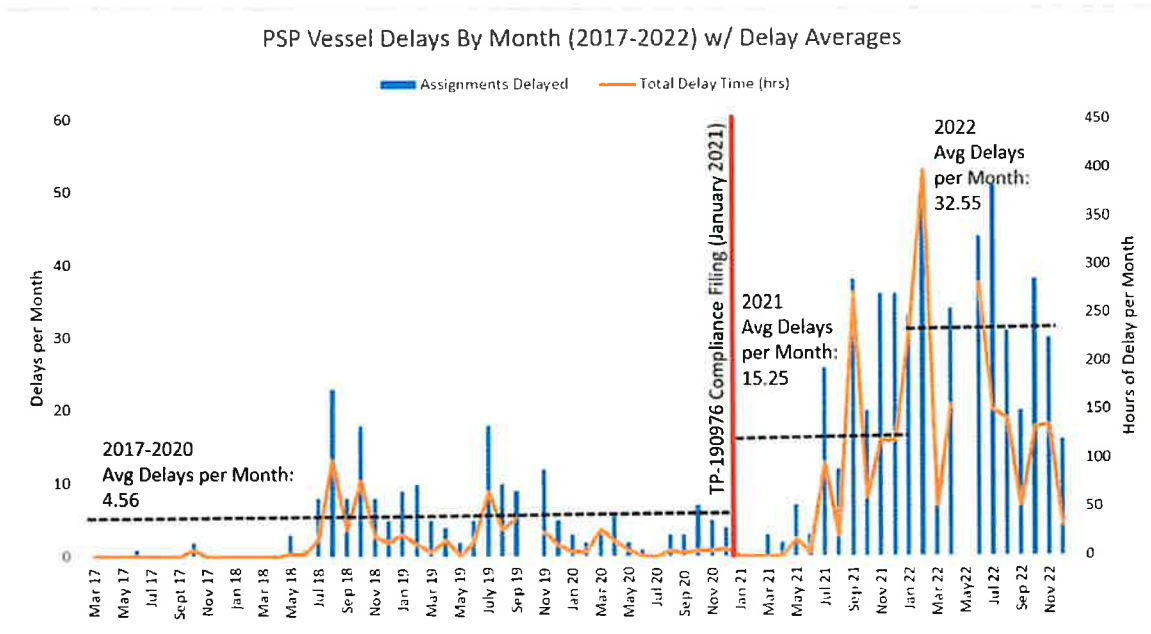
Prior to the adoption of its current “efficiency measures,” PSP did not formally reach out to industry for input of either the efficiency measures or in the development of key performance indicators by which the success of the roll-out of these measures would be evaluated and judged.

PSP still refuses to utilize base KPIs, such as daily pilot availability versus demand, which are obviously important to evaluate whether or not they have become more efficient in workload management and distribution. We still do not have transparency into dispatch, callback, and delay data that would allow for the measurement of these measures either. These are critical to identify so we can evaluate the “before and after” picture related to PSP’s implementation of their recent changes to their dispatch and watch changes.

Incentives and Disincentives Related to Service, Delays and Callbacks:

We urge the BPC to evaluate the incentives and disincentives for pilots to be fully available for assignments when “on-watch” versus “off-watch” and the incentives and disincentives to complete their fair share of assignments for a more even distribution of work.

The system should maximize the availability of safe, well-rested pilots to meet vessel demand, minimize the need for callbacks, and give PSP incentives to eliminate vessel delays. This is clearly not occurring now, as PSP in 2021 and 2022 created abnormally high levels of vessel delay.



Although the chart speaks for itself, it is worth noting that the increases in both the number of delays and total delay hours increased significantly and that these degradations in pilotage service reliability were not correlated with implementation of the 2015, 2018 and 2019 changes to pilot rest rules.

February PSP Activity Report Highlights the Lack of PSP Efficient Management

We just recently received the pilot activity report for February 2023 and incorporated it into this snapshot comparison with July 2021 which clearly demonstrates our concerns regarding the management of safe and efficient pilot availability.

The comparison is simply in evaluating the lack of PSP efficient management of its licensees. For example, in July 2021 with 48 working pilots, PSP was able to move 657 vessels without delays. However, in February 2023 with 49.6 working pilots, PSP was only able to move 430 vessels without delay. In July 2021, PSP was able to manage 52.8% more work with fewer pilots that did not result in delays, yet February 2023 still saw 18 pilot delays. These delays are clearly not a function of a lack of available licensed pilots – it is a result of inefficient dispatch.

	July 2021	February 2023
Assignments	704	466
Ship Move Assignments	683	448
Working pilots <i>Not counting President or NFFD</i>	48 <i>(per BPC Staff Spreadsheet)</i>	49.6 <i>Per PSP activity report after subtracting President/NFFD</i>
Highest Number of Assignments in a Day	37	23
Lowest Number of Assignments in a Day	11	11
Number of Pilots On Watch <i>Per PSP New Schedule</i>	Less than 24 (unless change day) <i>Given that pilots are not on watch 182.5 days/year</i>	25.3 per day w 52 working pilots <i>Based on PSP watch schedule showing 26.8 pilots on watch per day with 55 working pilots not accounting for NFFD and listing between 25 and 35 pilots on duty each and every day</i>
On Watch Pilots Compared to Assignments <i>(Continue to Request BPC to Track Daily Supply/Demand)</i>	24 Pilots Less than Peak Day Exceeds Avg of 22 assign/day	25.3 Pilots EXCEEDS High day of 23 EXCEEDS Daily Avg 16 Assig/Day
Half Number of Working Pilots Subtracting NFFD Days	24	24.8 <i>Based on the PSP Watch Schedule for 55, an estimated 23.5 to 33.5 pilots on watch each and every day with 52 pilots</i>
Pilot Delays	26	18
Ship Move Assignments Completed without Delay	657	430

PMSA looks forward to continuing to work with the BPC, PSP, and other stakeholders on implementing new efficiency KPIs and creating a more efficient pilotage system in the Puget Sound.

Sincerely,



Captain Mike Moore
Vice President

Attached: PMSA January 19, 2022 Ltr Regarding Pilot Efficiencies