

PACIFIC MERCHANT SHIPPING ASSOCIATION  
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 180-208

DATE PREPARED:	August 5, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

**PSP Data Request No. 202:**

Regarding the statement in Exhibit MM-42T, page 2, commencing on line 2, Capt. Moore states "Pilots' primary job should be to pilot, period." Please produce all documentation, including any statute, rule or order, that pilots' sole work responsibilities are to move ships and that all other aspects of pilotage, including planning for assignments, transportation, attending necessary meetings, obtaining required training and continuing education must be placed second to moving ships at all times.

**PMSA RESPONSE TO PSP DATA REQUEST NO. 202:**

Objection: This Request seeks production of information equally available to PSP from third-party sources.

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

PSP's data request misconstrues Capt. Moore's statement. Capt. Moore stated that "Pilots' primary job should be to pilot, period." This data request asks for documentation regarding a misstated claim "that pilots' sole work responsibilities are to move ships and that all other aspects of pilotage ... must be placed second to moving ships at all times." There is no documentation supporting such a claim as made in this request.

Capt. Moore's statement is that the pilots' primary job is to provide the service of pilotage. The service of pilotage in the Puget Sound is constrained by the provisions of the Pilotage Act (RCW Chapter 88.16). Certainly, Capt. Moore's statement is bounded by the lawful restraints and conditions which are associated with the provision of this service – and his statement need not be conditioned so as to say the obvious. For instance, Capt. Moore would never assert that "obtaining required training and continuing education must be placed second to moving ships at all times," because these are essential components and requirements of the provision of pilotage service under the Pilotage Act. Any suggestion by PSP that Capt. Moore would claim that pilots should not follow the provisions of the Act or otherwise maintain their licenses in good stead or act in a manner which is unsafe is unfounded.