

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

DATE PREPARED:	August 5, 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. 206:**

Has Capt. Moore ever confirmed in writing that he agrees that non-exempt foreign flagged vessels entering the Puget Sound Pilotage District should hire a Puget Sound Pilot? If so, produce all documents reflecting that admission. If not, admit that Capt. Moore agrees with the statement that each non-exempt foreign flagged vessel should be required to hire a Puget Sound Pilot. If you do not so admit, describe and document all studies, workpapers, journal articles, white papers or similar publications that demonstrate that vessels can be safely maneuvered in confined or congested waters without a pilot?

**PMSA RESPONSE TO PSP DATA REQUEST NO. 206:**

Capt. Moore agrees that foreign-flagged vessels entering into defined pilotage grounds within the territorial waters of the United States where any state has asserted authority for a licensed pilotage requirement as required under the laws of the United States and of any individual state. In the State of Washington, the requirements are clearly laid out in the state statutes of the Pilotage Act and regulations that the waters of the Puget Sound Pilotage District are subject to compulsory pilotage by state licensees to non-exempt foreign vessels. Capt. Moore has experience enforcing navigational regulations in areas where foreign-flagged and U.S. flagged vessels are serviced by federally licensed pilots and by state licensed pilots and finds that both systems can achieve the goals of navigational safety and enhanced economic competitiveness if managed properly.