

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 93-119

DATE PREPARED:	June 15, 2020	WITNESS:	John C. Ramirez, ASA
DOCKET:	TP-190976	RESPONDER:	Pacific Merchant Shipping Association, John C. Ramirez, ASA
REQUESTER:	Puget Sound Pilots		

PSP DATA REQUEST NO. 108: Do you have any basis then to dispute the attached article reference (<https://www.npr.org/2012/03/21/149091141/harbor-pilots-reap-high-rewards-for-dangerous-job>) that in 2012, the average pay for pilots nationwide exceeded \$400,000 annually? Assuming for now that that was the circumstance in 2012, do you believe your assumption of an income approximately \$250,000 below that for a "fair labor expense" for PSP annual income eight years later is reasonable?

RESPONSE TO DATA REQUEST NO. 108:

Objection. Overly broad, unduly burdensome, not reasonably calculated to lead to discoverable evidence, calls for information outside Mr. Ramirez's expertise and testimony. Subject to and without waiving said objection, Mr. Ramirez responds as follows:

Yes, the BLS wage data included in my testimony provides the basis for my opinion that a fair annual labor wage expense for a PSP pilot is approximately \$162,000.

I did not review the attached article in developing my testimony. However, in reviewing this article, I note that it claims, "The average salary of harbor pilots nationwide is more than \$400,000."

The PSP does not report any salary expense. The PSP reports owner's distribution. Salary is reported on a Form W-2. Salary is compensation for labor. Owner's distribution is reported on a Form K-1. Owner's distribution is compensation for owning, managing, and investing capital into a business enterprise.