

September 14, 2018

Mr. Mark Johnson, Executive Director and Secretary
Washington Utilities & Transportation Commission
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PO Box 47250
Olympia, WA 98504-7250

*Submitted via E-mail to records@utc.wa.gov
Submitted via Web Portal at www.utc.wa.gov/e-filing*

RE: Docket TP-18042

Comments of the Holland America Group Regarding CR-101 Rulemaking to Consider Adoption of Rules Relating to Marine Pilotage Rate-setting

On behalf of Holland America Group, representing Holland America Line, Princess Cruises, and Seabourn, thank you for the opportunity to submit comments regarding the proposed rulemaking to implement SSB 6519 (Chapter 107, Laws of 2018). We look forward to your rulemaking process to establish the rules for general rate proceedings to establish state tariffs which are fair, just, reasonable, and sufficient for the provision of marine pilotage.

The brands that comprise the Holland America Group operate cruise vessels around the world including the U.S. West Coast. Since our operations include a significant number of port calls in the Pacific Northwest, we are very familiar with pilotage in Washington state waters as frequent customers of the compulsory Puget Sound pilotage services.

We are aware that SSB 6519 was designed to improve and reform the marine pilotage rate and tariff setting processes. We are also aware that the shift or tariff setting responsibilities was designed in part to allow the Board of Pilotage Commissioners to better focus on oversight, safety and licensing. This is of key importance since the safety of our passengers, crews, vessel and the protection of the environment are our first priorities.

We are also keenly aware of the escalating costs of pilotage through nearly constant pressures to increase rates. This dynamic exists in many pilotage grounds. We are optimistic that UTC processes based on evidence and objective analysis will be of great assistance in achieving the requirement to establish tariffs that are fair, just, reasonable and sufficient for the provision of marine pilotage.

Please continue to send us further information on these rulemakings so we can revise or submit additional comments on this draft discussion document or more formally comment as the rulemaking proceeds.

Please feel free to contact me with questions, comments, or any additional follow-up to our letter regarding the rulemaking process, Docket TP-180402, or on any other matter related to the provision of compulsory state pilotage services. In addition, please feel free to also contact Aleks Drumalds, Assistant General Counsel (adrumalds@hagroup.com), with respect to this matter.

Thank you for the consideration of our comments.

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UTIL. AND TRANSP.
COMMISSION

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Records Management

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Eric A. Chamberlin', with a long horizontal flourish extending to the right.

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