



04 APR 2023

To Whom It May Concern:

I am writing this in support of the Puget Sound Pilots rate hearing which is scheduled to take place in front of the Washington Utilities and Trade Commission (UTC).

My name is John J (JJ) Malone, and I am the Designated Person Ashore (DPA) and one of the Port Captains for Schuyler Line Navigation Company (SLNC). From October 1992 through December 1999, I sailed as Third Mate, Second Mate, and Relief Chief Mate for what was then Maritime Overseas Corporation aboard their fleet of crude oil tankers, transiting most often to BP and Arco docks in Ferndale, and the Texaco Dock in Anacortes. Additionally, in 2007 I sailed as Chief Mate aboard the MV Green Dale with calls into Tacoma. While I may not have the experience of your waters as others do, I fully appreciate the importance of having duly qualified and licensed pilots aboard with significant experience prior to becoming pilots.

SLNC is a small US Flag operator with minimal calls to your ports. Our office is on the USEC, on the Chesapeake Bay to be specific, which many of us in the office enjoy during our free time, as many of you do with Puget Sound. We saw first hand the effects locally when the Ever Forward ran aground in the Bay just over a year ago, and as a licensed and experienced Unlimited Master, it was no surprise to learn of the distractions onboard at the time of that grounding. Current and future pilots need to have the experience to know they need to be focused 100% of the time, and there are times when other business can be attended to without it becoming a distraction. Unfortunately, this often comes from hard earned experience, as well as good mentors.

The marine industry, specifically, the manning qualifications are getting more and more complex given training, rest periods, commercial needs, and regulatory requirements, and as such the mariner pool is shrinking which also means those who wish to transition from Mariner to Pilot will be in higher demand, especially without lowering the standards for requirements (ie, a mariner who has sailed Unlimited Master vs one who only has a Third Mate license, or even one with a limited tonnage on tugs, but perhaps has only done harbour work vs a combination of towage and harbour).

As a small operator, we are always looking at the return on our costs and ways to improve them. However, one area I personally feel we should not cut on is pilotage costs. You get what you pay for, and although the business side of me would love for pilot fees to be lower, the professional mariner side of me expects that a lower rate will bring applicants with lower standards as the better ship handlers will opt for the bigger ports and money. Not everyone chooses a position because they love the area, there is more to it. If the Puget Sound Pilots need to address an increase in tariff to ensure a stronger future across the board in the Sound, then it is well worth supporting. The Sound relies on strong professionals to ensure the continued safe operation daily of the many US and foreign vessels that transit her waters. They need to be properly compensated to ensure their future success and the safety of the extensive Puget Sound.

Please feel free to reach out to me if I can provide any further information.

Regards

**John J. Malone III**  
**Port Captain / DPA**

Schuyler Line Navigation Company LLC

[jmalone@schuylerline.com](mailto:jmalone@schuylerline.com)

O (410) 216-6020 | M 443-871-4475