



March 29, 2023

David Danner
Chair
Washington Utilities & Transportation Commission
PO Box 47250
Olympia, WA 98504
Delivered via comments@utc.wa.gov

Re: Oppose Puget Sound Pilot General Rate Increase (Docket TP-220513)

To the Utilities and Transportation Committee,

I write to you as a former master with foreign cruise lines with 30+ years of sailing experience, and I am currently Vice President of Marine Operations for Holland America Line and Seabourn. Likewise, I served as a Pilotage Commissioner in Washington State appointed by the Governor. I witnessed worldwide safe sailings of big vessels entering and departing ports every day at the hands of colleagues in cooperation with those who have a similar background and expertise as the Puget Sound Pilots have.

I am writing to voice my concerns to the proposed increase in pilotage dues suggested by the Puget Sound Pilots. The Pilots are properly licensed and safe, and I know from my time as a commissioner that the qualification process sets a high bar. The comprehensive exam and simulator evaluation ensures we receive high quality candidates into the training program, which ensures trainees are ready to provide pilotage services upon completion. The licensing system works.

As a commissioner, I had concerns about the inefficiencies in managing pilot availability, given that on a routine schedule they have in general around 220 days a year not piloting but still reported issues with providing a rested pilot. To date the reasons for this inefficiency are still not clear to me.

Lastly, I am pleased that rate proceedings were moved to the UTC as it effectively separates tariff rates and pay from safety standards under the Board of Pilotage Commissioners.

I do suggest for the UTC to focus on costs of providing service, including legitimate expenses and compensation that will continue to attract a large enough pool of highly qualified candidates who can meet the high bar of successfully completing the training as well as provide the opportunity for a healthy and competitive pilotage charge atmosphere.

Best Regards,

Captain Rik Krombeen
Vice President Marine & Port Operations
Holland America Line and Seabourn