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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

<p>WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, Complainant, v. PUGET SOUND PILOTS, Respondent.</p>	<p>DOCKET NO. TP-</p>
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**TESTIMONY OF  
SCOTT COLEMAN  
PUGET SOUND PILOTS**

**NOVEMBER 19, 2019**

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Exhibit No.	Description	Page Referenced
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SC-3	Completed Chartlet of Local Areas and Routes	p. 7

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1 **I. IDENTIFICATION OF WITNESS**

2 **Q: Please state your name, business and business address.**

3 **A:** My name is Scott Coleman. My business address is 2003 Western Ave., Suite 200,  
4 Seattle, Washington, 98121.

5 **Q: Please describe your relationship with Puget Sound Pilots (“PSP”)?**

6 **A:** I am a pilot licensed in the Puget Sound Pilotage District and have been a member of  
7 PSP since I was first licensed on August 27, 2014. I am also one of PSP’s Directors.

8 **Q: Prior to becoming a licensed pilot, what is your professional background?**

9 **A:** I attended Maine Maritime Academy, graduating in 2000 with a bachelor of science in  
10 Marine Transportation Operations. Following graduation, I hired on with Olympic Tug  
11 and Barge and worked there continuously until I left to start the state pilotage training  
12 program. While with Olympic Tug and Barge, I was assigned to vessels on the U.S.  
13 West Coast between Vancouver Island, B.C. and San Francisco, CA, engaged primarily  
14 in the movement of black oil and bunker barges between 23,500 and 50,000 barrels.  
15 The routes traversed the Puget Sound, the Straits of Juan de Fuca, Straits of Georgia  
16 and on the Columbia and Willamette Rivers, and San Francisco Bay. I started as an  
17 Able Bodied Seaman and worked my way up to Mate, and then to Master.

18 **Q: Do you hold any professional licenses?**

19 **A:** Yes, I do. I hold licenses from the United States Coast Guard as a Master, 1600 Gross  
20 Tons, Oceans, Master of Towing Vessels, Third Mate, Any Gross Tonnage, Oceans,  
21 USCG Federal Pilotage of vessels of unlimited tonnage upon Puget Sound and all  
22 connecting inland waters, including the Waters of Haro Strait, Boundary Pass, and the  
23 Strait of Georgia and State Licensed Pilot, Washington State, Puget Sound District,  
24 without limitations.

1 **II. PURPOSE OF YOUR TESTIMONY**

2 **Q: Will you please describe the purpose of your testimony?**

3 **A:** It is my intent to supply the Commission with information regarding the requisites for  
4 becoming a pilot and maintaining a license, and related information regarding the skills  
5 needed to be a pilot, to assist the Commission with understanding the nature of the job,  
6 the level of skill and difficulty required of the job, and the nature of some of PSP's  
7 expenses that we are seeking to include in rates.

8 **III. LICENSURE**

9 **Q: What does it take to become a Puget Sound Pilot?**

10 **A:** In my view, there are two aspects of the answer to that question. The first part is the  
11 technical legal requirements to become a pilot. The second is the process one must go  
12 through to meet those requirements.

13 **Q: What are the legal requirements to become a pilot?**

14 **A:** By law, in order to become a pilot licensed by Washington State in the Puget Sound  
15 district, one must hold a Master's license from the United States Coast Guard  
16 ("USCG"), along with a First Class Pilotage ("FCP") endorsement for waters of the  
17 entire Puget Sound district, as well as a pilot's license from the Washington Board of  
18 Pilotage Commissioners ("BPC"). There are a number of other standards, including  
19 fitness for duty, but those are the two primary considerations.

20 **Q: How does the process of obtaining a state license work?**

21 **A:** Typically, the process starts with a candidate qualifying for and passing the BPC's state  
22 pilotage test, which is offered at least once every four years. After passing the test,  
23 candidates must wait their turn to enter the training program, which only trains about 10  
24 candidates at a time, and successfully complete it.

25 **Q: What prerequisites must be met to qualify for the state pilotage test?**

1 **A:** To qualify to test, a candidate must be at least 25 years of age, a United States citizen,  
2 and must have spent sufficient time as the master of a qualifying vessel while holding at  
3 least a 1600 gross ton USCG Master's license. Candidates must also pay state pilotage  
4 exam fees.

5 **Q: Are state pilotage examination fees significant?**

6 **A:** They are. Historically, the BPC divided the total cost of administering the exams by  
7 the number of applicants and charged that amount as the exam fee. This practice kept  
8 the exam fees in a range of \$5,000 or more. More recently, the exam fees have been  
9 reduced, but they are still more than \$3,500 per examinee.

10 **Q: Are there any other costs associated with taking the exams?**

11 **A:** Absolutely. In preparation for the BPC pilotage exams, after studying solidly for a year  
12 at any opportunity, I took a straight 6 1/2 weeks off from my job as a Master with  
13 Olympic Tug and Barge to study for and take the exams. All told, I believe that  
14 preparing for and taking the exams cost me nearly \$15,000 in out-of-pocket expenses..  
15 I understand many other pilots have similar experiences and out-of-pocket expenses in  
16 taking these exams.

17 **Q: What does the exam entail?**

18 **A:** The state pilotage exam is really two separate tests. The first test is a four-and-a-half  
19 hour, 150 question multiple choice test based on general pilot knowledge. Once the  
20 multiple choice test is passed, applicants are invited to take the simulator test, which  
21 typically lasts 50 minutes and simulates a full mission bridge testing the candidate's  
22 mastery of fundamental pilot skills, the ability to assimilate and prioritize all data  
23 necessary to safely maneuver the ship, the ability to respond appropriately in routine  
24 situations, the ability to communicate and project the proper bridge presence, an  
25

1 understanding of bridge resource management, and assimilating all the rules of the  
2 road.

3 **Q: After passing the exam, will a candidate be able to enter the training program**  
4 **immediately?**

5 **A:** Not usually. The training program has a maximum capacity of about 10 trainees, and  
6 there is almost always a waiting list to enter it. Even if the need for new pilots is high  
7 the BPC historically staggers the start times of new trainees so that they are spread out  
8 through the different phases of the training program. Typically it takes several years  
9 after the test to work through the list of waiting candidates.

10 **Q: Is the list ordered in any particular way?**

11 **A:** Yes, it is. The candidates who passed the state pilotage exam are ranked from highest  
12 to lowest based upon their overall score, and those ranked highest have the first  
13 opportunity to enter the training program when a spot becomes available. This ranking  
14 also continues within the training program, giving trainees with the highest rank a right  
15 of first refusal for the trips required to complete the training program.

16 **Q: Is it necessary to hold the USCG FCP endorsement prior to taking the exam or**  
17 **entering the training program?**

18 **A:** That was once the case, but the prerequisite to have a USCG FCP endorsement to take  
19 the state pilotage exam was eliminated, with the goal of attracting a broader field of  
20 qualified mariners around the country. Trainees may now complete the USCG tests and  
21 obtain their USCG FCP endorsement after passing the state pilotage exam. The  
22 endorsement must be complete before a trainee completes the state training program  
23 and becomes licensed, however.

24 **Q: How does one obtain a First Class Pilot Endorsement from the Coast Guard?**  
25

1 **A:** The short answer is that you complete a number of observational trips along each of the  
2 routes in the district, then apply for the endorsement. Applicants must then pass a  
3 series of testing modules specific to the pilotage district.

4 **Q. Is it necessary to have a Master's license to receive a USCG FCP endorsement?**

5 **A.** Not technically. In the ferry system, Mates frequently obtain federal pilotage  
6 endorsements specific to their routes. However, a Master's license is a prerequisite for  
7 obtaining a state pilot's license. Thus, most candidates for a state pilot license have  
8 already achieved the rank of Master.

9 **Q: What is entailed in becoming obtaining your Master's license?**

10 **A:** There are two paths to becoming a Master. The first, which I took, involves attending  
11 one of the four-year maritime academies, where from you graduate with a Mate's  
12 license. Then depending on your career path obtaining more senior mate's licenses or a  
13 limited Master's License. Since my career was with the local tug and barge fleet, I  
14 qualified to obtain my 1600 gross ton Master's license after the necessary service time  
15 and completing the required testing of the Coast Guard. The second path is commonly  
16 known as "coming up through the hawspipe." These mariners start in an unlicensed  
17 capacity on board as an ordinary seaman, and through seetime, sailing experience, and  
18 sitting for license tests, obtain their officer's licenses, eventually working their way up  
19 to Master. With a diminishing United States flagged deep sea fleet, that process can  
20 take anywhere from 10 to 20 years.

21 **Q: Can anyone holding a Master's license be issued a federal pilotage endorsement?**

22 **A:** No. In order to qualify to obtain a First Class Pilot's endorsement ("FCP"), you must  
23 have experience on vessels over 1600 gross tons or obtain that experience after first  
24 being issued an endorsement for a limited tonnage.

25 **Q: What is the process for obtaining the FCP endorsement?**

1 **A:** It is a time-intensive and enduring process to obtain a FCP endorsement in any pilotage  
2 district and the process is custom tailored to that district. In relation to any other  
3 pilotage district in the country, with the possible exception of those in Alaska, Puget  
4 Sound has the most individual chartlets. Because the process is such a huge  
5 commitment, once a candidate starts training in a district, they are usually “all-in” and  
6 remain in that district for their entire career. The process for obtaining the FCP  
7 endorsement first requires a candidate to complete a number of familiarization trips on  
8 each route in the district, then to complete all of the USCG required tests. For Puget  
9 Sound, this includes the Rules of the Road, Winds and Weather, Vessel Traffic Service  
10 (“VTS”) and Route Descriptions (written descriptions of local information), of which  
11 there are 23 separate tests. In addition to those written tests, the Coast Guard requires  
12 a candidate to sketch from memory 26 separate chartlets of the local waters.

13 **Q: Will you please elaborate on what is entailed in the Route Descriptions testing?**

14 **A:** Route Descriptions test a candidate’s understanding of local area, including tides and  
15 currents, traffic lanes and local vessel traffic (including ferries and private vessels), and  
16 special harbor pilot and customs rules, including speed limits, bridge signals, and times  
17 of opening and closing of bridges. Three of these tests also require special specific  
18 knowledge of the Vessel Traffic System (“VTS”), including special rules, the check-in  
19 points, and radio frequencies used. These tests also require knowledge of the location  
20 of anchorages, as well as their depth and type of bottom, knowledge of the location of  
21 restricted areas including the nature of the restrictions and signals used, as well as  
22 descriptions of prominent geographic features and man-made structures. If a chartlet  
23 represents the visual description of what is happening within an area, the route  
24 description is the written one.

25 **Q: What is entailed in drawing chartlets of the local areas or routes?**



1 The chartlets that must be drawn as part of the examination modules are different in  
2 each pilotage district. For the Puget Sound, there are 26 separate chartlets that must be  
3 drawn for the local waters and routes, each of which begins with a blank chartlet with  
4 only the shore line and true north drawn in. The FCP candidate must then sketch a  
5 multitude of factors demonstrating their intricate knowledge of the local area or route,  
6 including magnetic variation, annual changes, true and magnetic north, geographic  
7 features, all navigational aids, prudent courses and reaches with distances and bearings  
8 to aids at course change positions, shoals, prominent landmarks, mud flats and other  
9 navigational hazards, as well as havens, enroute and good anchorages along with  
10 bottom characteristics. Completing charts correctly also requires the FCP candidate to  
11 demonstrate knowledge of all cable areas and vessel traffic lanes, general anchorage  
12 areas, restricted areas, and disposal areas, plus bridges over waterways with their  
13 clearance, ferry crossings, and other pertinent features.

14 **Q: Have you supplied examples of a blank and completed chartlets as exhibits to your**  
15 **testimony?**

16 **A:** I have. A blank chartlet was filed as Exh. SC-2 and a version of that chartlet completed  
17 by a pilotage candidate was filed as Exh. SC-3.

18 **Q: Will you please also elaborate on the observational trips required to obtain the**  
19 **FCS endorsement?**

20 **A:** Of course. The Coast Guard requires what it calls “Route Familiarization” trips for the  
21 pilotage waters on which the candidate seeks an FCS endorsement. If the goal is to  
22 become a state pilot for the Puget Sound, the candidate is required to obtain an “All  
23 Puget Sound and Connecting Waters Endorsement.” This requires the candidate to take  
24 route familiarization trips for every main ship channel route, terminal port, lesser port,  
25 routes and ferry routes.

1 **Q: Are there many routes with which a candidate must become familiar?**

2 **A:** There are quite a few, in fact. All of the main ship channels, including all of the routes  
3 following the Traffic Separation Schemes, and routes including Alden Bank to Point  
4 Roberts, Haro Strait including Boundary Pass, Hood Canal, Blaine, Deception Pass,  
5 Swinomish Channel, and Saratoga Pass, the Lake Washington Ship Canal and Lake  
6 Washington, Colvos Passage, and Point Defiance to Dofflemeyer Point. Once  
7 becoming familiar with those routes, a candidate must learn the terminal ports,  
8 including Port Angeles, Anacortes, Bellingham, Cherry Point/Ferndale, Everett, Seattle  
9 (including the Duwamish Waterway), Tacoma and Olympia. The candidate must also  
10 observe on all of the Washington State Ferry routes, including those in the San Juan  
11 Islands (terminals at Anacortes, Friday Harbor, Lopez, Shaw, and Orcas and passage  
12 through Upright Channel, Harney Channel, Wasp Passage, and Spieden Channel), Port  
13 Townsend – Keystone, Mukilteo – Clinton, Edmonds – Kingston, Seattle – Bainbridge,  
14 Seattle – Bremerton, Fauntleroy – Vashon – Southworth, and Point Defiance –  
15 Tahlequah.

16 **Q: How many familiarization trips must be taken for each of those points or**  
17 **channels?**

18 **A:** The requirements vary for each, but most require at least 12 round trips over the route.

19 **Q: How long does it take to complete a single round trip?**

20 **A:** For many of these transits, the vessels will not complete a single continuous round trip.  
21 Instead, the candidate must ride each direction of the round trip separately, thus  
22 requiring 12 separate trips for each direction of the route. Ultimately the time it takes  
23 to complete a round trip varies based upon availability of a ship transiting the route, but  
24 candidates can spend over an entire week of 12 hour days to become familiar with a  
25 single channel or route.

1 **Q: How long does it typically take to complete all of the trips necessary to obtain an**  
2 **All Puget Sound and Connecting Waters FCP Endorsement?**

3 **A:** I can't say that there is a typical amount of time, because each pilot candidate has  
4 completed a different number of observations trips for federal pilotage prior to testing  
5 for their state pilotage license. In my case, I had been taking federal observation trips  
6 for nearly a decade prior to taking the state pilotage exam, and continued my  
7 observation trips while waiting to enter the state training program along with  
8 completing those last outstanding trips that I had while in the training program.

9 **Q: How long does it take to complete the state pilotage training program?**

10 **A:** The state training program is generally a 15 to 24 month program, now with a hard stop  
11 at 36 months. The time an individual takes depending on a number of factors,  
12 including the amount of federal pilotage requisites remaining for the trainee, the  
13 number of trainees in the program, the trainee's ranking on state pilotage exams, and  
14 how aggressive the trainee is able to be in completing the program.

15 **Q: How long did it take you to complete the training program?**

16 **A:** It took me 15 months because I had already obtained my federal pilotage endorsement  
17 for a number of routes before entering the training program.

18 **Q: Are trainees permitted to keep jobs to earn a living while working in the training**  
19 **program?**

20 **A:** That is permitted, but in order to move successfully through the training program most  
21 trainees opt fully dedicate themselves to training and receive the BPC stipend of \$6,000  
22 a month, which is funded through a surcharge on the pilotage tariff. Qualifying for the  
23 stipend is dependent upon full-time participation in the program, with no other  
24 employment. Because prior to attending the training program trainees were required to  
25

1 have served on vessels as a Master for a number of years, this means that trainees  
2 typically give up a considerable portion of their income to enter the training program.

3 **Q: Are there any requirements a trainee must meet in order to receive the stipend?**

4 **A:** Yes. I understand that in order to be paid the full stipend, trainees must successfully  
5 complete at least 18 trips a month. If trainees are unable to complete 18 trips, but at  
6 least 12 are completed, the BPC will also now pro-rate the stipend.

7 **Q: What curriculum or work experience does the training program entail?**

8 **A:** The training program consists of four distinct phases: observation, training, evaluation,  
9 and Personal Piloting Unit (“PPU”) training.

10 During the observation phase, trainees must complete approximately 100 observation  
11 trips, in which the trainee goes on an assignment with a licensed pilot and observes how  
12 the pilot completes the assignment. When observing, a trainee asks the pilot questions  
13 and observes how he or she completes pilot’s duties. These trips also include  
14 observation from on board a ship assist tug so that the trainee can see and discuss  
15 transits from the tug’s perspective. During the observation phase, trainees are also  
16 expected to pass related 20 multiple choice tests known as ‘conning quizzes’ covering  
17 local knowledge for the routes, taken at the BPC office.

18 Once a trainee successfully completes the observational phase including its testing  
19 component, they receive permission from the TEC to enter the training phase. This  
20 phase also includes approximately 100 trips during which the trainee works with a  
21 licensed pilot one-on-one and gives the trainee an opportunity to conn the vessel with  
22 coaching and open communication from the pilot, who of course ultimately has the  
23 conn during these exercises.

24 **Q: What is the next step?**

1 **A:** Following the Training phase, trainees enter the Evaluation phase. This phase too is  
2 approximately 100 trips. During this phase, trainees must show they have developed  
3 the skills to pilot independently. Under the observation of the licensed pilot the trainee  
4 is expected to complete the job as if it were performed independently, with the licensed  
5 pilot allowing the trainee to work unassisted unless the vessel is potentially endangered.  
6 If the vessel becomes endangered, the pilot must intervene, and if a candidate has a  
7 pilot intervene four times during the course of their evaluation phase, the trainee is  
8 ultimately removed from the training program and will not become a licensed pilot.  
9 Once the trainee is near the end of their training, he or she must also take a two day  
10 course on use of the PPU, its programs and its peripheral devices. The trainee is then  
11 assigned up to four trips to ensure their familiarity with the PPU while underway.

12 **Q: Can the trips taken during the observation phase be counted towards the**  
13 **requirements for obtaining a USCG FCP endorsement?**

14 **A:** Since the time the BPC eliminated its requirement that trainees already hold a federal  
15 pilotage license, observational trips made for the state training program have indeed  
16 been counted toward the familiarization trips required for the USCG FCP endorsement.  
17 Without this overlap, it would take considerably longer to be licensed.

18 **Q: Does the training program ensure trainees become familiar with every class of**  
19 **vessel that pilots serve in the Puget Sound?**

20 **A:** Yes. Our district is fortunate to serve a wide variety of vessel classes. The BPC's  
21 Training Evaluation Committee ("TEC") ensures that trainees are exposed to container  
22 ships, tankers, bulkers, ro/ro (roll-on-roll-off), carriers, cruise ships, general purpose,  
23 and reefer ships by virtue of being assigned trips to almost every specific terminal in  
24 the district. New pilots also gain familiarity with larger vessel classes through upgrade  
25 trips required to earn higher license levels.

1 **Q: Are there any other licensure requirements that you have not covered?**

2 **A:** There are some, including some disqualifying criteria, but my testimony here covers the  
3 most significant components of the program's requirements.

4 **Q: Upon completion of the training program is a trainee automatically licensed?**

5 **A:** No. To become licensed, each trainee must complete all four phases, be approved by  
6 the TEC, pass a physical examination, and pay the BPC's required license fee. In  
7 addition to those requirements, there must also be an opening for a new license before  
8 the BPC has traditionally granted a license to a new pilot. At times in the past,  
9 candidates who completed the training program have waited months, if not over a year,  
10 to become licensed. Right now, however, there has been a pilot shortage and successful  
11 candidates are becoming licensed as soon as they complete all of the requirements and a  
12 recommendation from TEC is approved by the BPC. Once there is an opening, a  
13 candidate who has completed all other requirements can be approved for their license at  
14 the next regular meeting of the Board of Pilotage Commissioners.

15 **IV. LICENSE UPGRADES**

16 **Q: Once a trainee becomes licensed, does that license permit a new pilot to handle all  
17 of the jobs that are required of a pilot in the Puget Sound?**

18 **A:** No. There are actually six license levels. A new pilot in their first year is not permitted  
19 to pilot ships loaded with oil, or pilot cargo ships larger than 38,000 gross tons or pilot  
20 passenger ships greater than 5,000 gross tons. The license levels are set forth in rule as  
21 follows:

22

<b>Year</b>	<b>Loaded Oil</b>	<b>Other than Oil</b>
1	Piloting on vessels of any size prohibited.	38,000 GT (ITC) except for passenger vessels which may only have a maximum size of 5,000 GT
2	32,000 GT (ITC)	48,000 GT (ITC)
3	40,000 GT (ITC)	60,000 GT (ITC)
4	50,000 GT (ITC)	70,000 GT (ITC)
5	65,000 GT (ITC)	95,000 GT (ITC)

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25

TESTIMONY OF SCOTT COLEMAN, Exh. SC-1T - 12

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6	Unlimited	Unlimited
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1  
2 **Q: How does a pilot earn a higher level of license?**

3 **A:** During the final 120 days before a new pilot's licensure anniversary, they enter an  
4 upgrade period during which he or she is expected to complete eight trips on ships at  
5 the next license level. As I mentioned earlier, these are upgrade trips made aboard  
6 ships of a specific size, length and route, typically larger and longer than the pilot is  
7 already licensed to handle. This gives the junior pilot an opportunity to work with a  
8 more senior pilot while handling of ships in the next license level before handling ships  
9 of that size independently. This process is repeated each year during a new pilot's first  
10 five years. Once the pilot has reached the 6<sup>th</sup> license level, his or her license is  
11 unlimited and no further upgrade trips are required.

12 **Q: What occurs if a pilot fails to take the necessary upgrade trips to earn the next**  
13 **license level?**

14 **A:** From the perspective of licensure, the pilot would merely maintain the license level  
15 they had previously earned. However, PSP operating rules do not permit a pilot who  
16 failed to upgrade their license to continue being dispatched or receive distribution from  
17 PSP until the license is upgraded. This ensures that pilots are moving up in the license  
18 levels at the fastest pace, which is necessary to ensure that retiring pilots who have  
19 garnered all licensure levels can be replaced as quickly as the license upgrade system  
20 permits.

21 **V. MAINTAINING A PILOT'S LICENSE**

22 **Q: Are there any additional requirements a pilot must meet in order to maintain their**  
23 **license once it has been issued by the BPC?**

24 **A:** Yes. Washington state pilot licenses are valid for five years. While licenses are  
25 renewed as a matter of course, each pilot must pay an annual license fee, pass an annual

1 physical by a BPC-approved physician, and complete continuing education  
2 requirements. It is also required that the pilot maintain both their USCG Master's  
3 license and federal FCP endorsements.

4 **Q: What continuing education or training requirements are imposed upon licensed  
5 pilots to qualify for license renewal?**

6 **A:** We are required to complete simulator training within the first year of active duty and  
7 at least once every five years for all other active pilots.

8 **Q: What kind of simulator is used for meeting the state continuing education  
9 requirement?**

10 **A:** Most frequently, pilots complete their continuing education through manned model  
11 training.

12 **Q: What is manned model training?**

13 **A:** Manned model courses are week-long ship handling courses that use scale models of  
14 ships. These courses typically use a combination of classroom training and hands-on  
15 ship handling simulations in confined waters. Manned model training is considered the  
16 international standards for ship handling training.

17 **Q: Where are these courses located?**

18 **A:** Most of the manned model courses are overseas, although I understand recently a  
19 program has been started in Louisiana as well.

20 **Q: Do Puget Sound Pilots receive any additional training beyond what is required  
21 under the law?**

22 **A:** Yes, we do. Over the years, PSP has done a significant amount of continuing education  
23 on our own to ensure pilots maintain our high professional standards for each type of  
24 assignment we are expected to handle. Those courses have included Azipod training  
25 and Azipod renewal, Electronic Charting Display and Information System – Pilot



1 (ECDIS-P), Bridge Resource Management – Pilot (BRM-P), T-Squared Ship Assist,  
2 Waterway Simulation for Large Container Ships in the Blair Waterway, 14,000 TEU  
3 Ultra-Large Container Ship (“ULCS”) simulator training (Evergreen), Escort Team  
4 Training, Tethered Escort Simulation, 18,000 TEU ULCS – East Waterway (CMA  
5 CGM Ben Franklin), and Train the Trainer for the BPC.

6 **Q: Do those courses have any expense for PSP?**

7 A: Yes, they do. They have both out of pocket expenses incurred by the association, and  
8 impacts on dispatch availability, since pilots perform training both on duty and off duty.  
9 In so far as possible, we have tried historically to limit training to while pilots are off  
10 duty and to outside of the cruise ship season. Due to scheduling availability at the  
11 schools where we perform these trainings, this is not always possible. Right now, with  
12 a pilot shortage, every time a pilot is training the dispatch system can be strained, along  
13 with decreasing the number of pilots available to be called back off-duty.

14 **Q: Are there minimum health standards that a pilot must meet in order to be**  
15 **qualified under their license to move vessels?**

16 A: Yes. Each year we are required to undergo a physical examination that is designed to  
17 detect physical, mental or organic conditions that might preclude a pilot from safely  
18 performing their duties in all of the circumstances required of a pilot, including during  
19 day or night, all weather conditions, including high winds, fog, mist, rainfall, falling  
20 snow and other adverse conditions. There are quite a few disqualifying conditions  
21 listed in the BPC’s rule; some of them are temporary and permit a pilot to return once  
22 resolved or appropriately managed. Others can result in a permanent disqualification  
23 of the pilot from operating under his or her license.

24 **Q: Are pilots subject to any mandatory drug testing requirements?**  
25

1 **A:** Yes. As a matter of USCG regulation, pilots are subject to both quarterly random drug  
2 screening and drug testing following any reportable event (serious marine incidents).  
3 PSP partners with a third-party to perform drug screens of randomly selected on-duty  
4 pilots and it is our policy that if a drug test provides a medically-confirmed positive  
5 result, the pilot is immediately removed from dispatch until authorized for duty by the  
6 USCG and BPC.

7 **VI. SECURITY CLEARANCE**

8 **Q: Are there any other limitations or requirements that pilots must adhere to in**  
9 **order to perform their job duties?**

10 **A:** Yes. The most significant one of which I am aware is the necessity of obtaining a  
11 Transportation Workers' Identification ("TWIC") card.

12 **Q: What is a TWIC card?**

13 **A:** A TWIC card is an access card that has been required by the Department of Homeland  
14 Security since 9/11 to enter international cargo terminals. Pilots are required to obtain  
15 one, which requires an FBI background check, because we are frequently called upon to  
16 enter or exit international cargo terminals when completing or commencing an  
17 assignment.

18 **Q: Does this conclude your testimony?**

19 **A:** Yes, at this time.  
20  
21  
22  
23  
24  
25