

Exh. MM-44
Docket TP-220513
Witness: Michael Moore

**BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket No. TP-220513

**EXHIBIT TO TESTIMONY OF
Captain Michael Moore
ON BEHALF OF
PACIFIC MERCHANT SHIPPING ASSOCIATION**

PMSA “Re: Improving PSP Inefficiencies” January 19, 2022

FEBRUARY 10, 2023



January 19, 2022

Chair Sheri Tonn
Washington State Board of Pilotage Commissioners
2901 Third Ave., Ste. 500
Seattle, WA 98121

Re: Improving PSP Inefficiencies

Dear Chair Tonn:

On behalf of PMSA, I am writing this letter today to express our encouragement and to offer our continued assistance to address system inefficiencies in the state pilotage system. We look forward to working with PSP to address inefficiencies which exist and may be improved.

At a recent BPC meeting, PSP President Captain Carlson indicated that two consultants had been hired to help PSP address system inefficiencies. This is a welcome step to implement UTC's recommendation that PSP hire an outside consultant to study its organizational efficiency (Paragraph 109, UTC Order 09, November 25, 2020). Following through on this UTC recommendation to examine ways to improve its management of workload and other systems is important to PSP and to the pilotage system in many respects, as explained further by the UTC (Para. 106, Order 09):

Again, the purpose of economic regulation is to promote efficiency rather than to direct internal management decisions. By setting the revenue requirement, the Commission is providing PSP "an opportunity, given wise and efficient management, to earn that return." In this case, we share PMSA's concerns that it is difficult to evaluate the efficiency of PSP's management of its workload and that PSP may be missing opportunities to provide incentives for pilots to accept assignments.

As PSP engages in this process and initiates its reporting to the BPC regarding the findings of these consultants, PMSA offers to provide input from pilotage users regarding potential efficiency improvements. We are prepared to share our observations and suggestions from the perspective of those that order and use pilot services as pilotage efficiency is a benefit to both pilots and customers and is consistent with the mandates of the Pilotage Act.

As BPC is aware, PMSA has provided significant comments for nearly two decades regarding opportunities to improve pilotage efficiencies while maintaining full compliance with safety and rest standards. Similar to non-emergency guideline changes, we recommend full consideration of input from users to validate changes being considered and/or to potentially highlight new or different continuous improvement changes. Finding efficiencies should be an ongoing dynamic for everyone in the supply chain, and given the current condition of the economy, the topic of intermodal supply chain efficiency is getting significant scrutiny and attention from local governments up to the White House. Ocean carriers, our gateway seaports, marine terminals, shippers, and service providers (agents, bunkering, tugs, terminals, pilots, etc.) must all be committed to continuous improvement given the current demand for effective intermodal service.

Here is an abbreviated list of historic industry suggestions regarding efficiency improvements that we again offer here as a potential for additional discussion:

- Pilot Ordering
 - Expand ordering hours
- Watch System Adjustments to better match available rested pilots to demand
 - Move to multiple watches with more transition days
 - Reduce transition time from 24 hours (full day of duty) to perhaps 8 hours or less
 - Set transition days on busiest days of the week
- Dispatch
 - Bunch short assignments to minimize travel/prep and ability to safely perform multiple assignments in one day
 - Assign pilots geographically closer to shifts or emergency repositioning or assignments that would otherwise require additional rest or multiple pilots
 - Facilitate pilots trading duty days so long as they comply with rest rules
 - Use forecast metrics to optimize repositioning and assignment planning by individual pilots – include use of inbound vessels tracking from sea/BC (dispatch log)
 - Use forecast metrics to maximize use of outbound assignments as the repositioning at PA for an inbound assignment
- Call backs and comp days
 - Change internal rules to ensure a more even distribution of assignments; having a range from 90 to over 220 is not efficient
 - Change the revenue distribution rules to reward those safely doing more work or set standards that require taking a certain number of call backs over the course of a year
 - Those falling behind productivity of the average pilot would not having ongoing ability to refuse call backs without safety or other serious considerations
 - Manage comp day accumulation and use to minimize impacts to service
- Management of vacation, meetings, training, medical or other activities that remove pilots from being available to pilot
 - Adjust ETO due to less duty time on transition days
 - Minimize use and/or bunching of ETO/vacation during busy periods
 - Minimize training during duty weeks that cause delays or call backs
 - Maximize Executive Director representing PSP at various meetings rather than pilots
 - Use the President or designated other pilot only when pilot's navigational expertise is needed, not for routine business
 - Maximize use of remote meeting options commonly used now (Teams, Zoom, etc.) and minimize use of on duty pilots for meetings.
 - Adjust watch to avoid potential bunching of NFFD pilots on same duty rotation,

We stand ready to provide input for consideration to PSP and/or BPC and with respect to full implementation of the Pilotage Act.

Sincerely,



Captain Mike Moore
Vice President

cc: Puget Sound Pilots