

Comment

190976 S3 Maritime

Owner

 Andrew Roberts

Comment Information

CONTACT INFORMATION

Name S3 Maritime

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Address 1: City Seattle

State/Province WA

**Address 1:
ZIP/Postal Code** 98199

Details

Comments May 25, 2020

Washington Utilities & Transportation Commission
621 Woodland Square
Lacey, Washington 98503

Re: Docket # TP-190976

Dear Utilities & Transportation Commission,

I am providing public comment on behalf of S3 Maritime. Our company, classified by the U.S. Small Business Association (SBA) as a Small & Medium Sized Enterprise (SME), is located in Seattle, Washington and employs thirty seven individuals. We are primarily engaged in the servicing of recreational vessels, many of whom are subject to compulsory pilotage under RCW 88.16.070. We understand Puget Sound Pilots filed a petition for tariff revision on November 20, 2019, seeking a significant increase in the tariff rate. While we are not requesting to be part of the formal proceedings regarding this tariff revision petition, we do wish to provide public comment. The vessels we service are used for recreational activities, are not registered in Washington State, and simply transit our state

en route to British Columbia and Alaska. As such, in most instances these vessels have the option to bypass Washington State altogether and simply continue into British Columbia and/or Alaska. While Puget Sound provides an unparalleled suite of services for these vessels, captains and vessel owners must consider all "discretionary" expenditures when formulating operational plans. The cost of pilotage is certainly something they must consider. It is our opinion that increasing pilotage rates for recreational vessels at this time is not necessary and in fact would create a disincentive for recreational vessels to seek services in Puget Sound.

Given the current economic climate, we feel that any additional costs that act as a deterrent to recreational vessels seeking services in Puget Sound would not only negatively impact our business, but would also have a negative impact on Washington State as recreational vessels may simply forgo the state and continue their journey to British Columbia and/or Alaska. Considering that a typical vessel will spend approximately \$50,000.00 per visit with us, we feel that the loss of even a single recreational vessel as a result of increased pilotage fees is unacceptable.

As such, we oppose the Puget Sound Pilots tariff revision petition. We appreciate your consideration of our position and would be happy to provide any additional information at your request. Thank you in advance.

Sincerely,
Michael M Tobin
S3 Maritime

Source	Web	Open Date	6/3/2020 4:21 PM
Filing Support	No	Web Create Date	5/26/2020
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Related Case Information

Case Number	 190976	Case Title	Puget Sound Pilots
Owner	 Andrew Roberts	Staff Case Lead	 Danny Kermode

Themes

Name	Created On
No Theme records are available in this view.	
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