

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 127:

On what subject matters does Mr. Moore contend he is qualified to proffer expert testimony in this proceeding under ER 702?

PMSA RESPONSE TO PSP DATA REQUEST NO. 127:

Objection: Beyond the scope of testimony offered; argumentative; misleading; mischaracterizes testimony; irrelevant; untimely.

Subject to and without waiving said objections, PMSA answers as follows:

Capt. Moore is the Vice President of, and appears as representative for, PMSA, who was granted the right to participate in this hearing subject to Order No. 2. Capt. Moore's testimony presents the position of PMSA as a statutorily identified representative of interested ratepayers. As a ratepayer-advocacy organization, PMSA has designated Capt. Moore to present its lead testimony in order to communicate its positions and present evidence with respect to the Petition submitted by PSP in this matter. Neither the relevant provisions of the RCW or the WAC governing this process, nor Order No. 2, limit PMSA's right to appear or to proffer lay or expert testimony. Nor does applicable law, nor Order No. 2, require parties to expressly identify testimony as lay or expert testimony, or to limit the substance of witness's testimony based on such identification.

Capt. Moore's testimony was offered in the same manner by which PSP's testimony, WUTC's testimony, and PYM's testimony was presented; none of the extensive opinion testimony in this proceeding from any of these parties was formally proffered as expert testimony under ER 702. Indeed, at least one party has dispensed with other evidentiary formalities in addition to the formalities of ER 702; to wit, PSP's testimony was not even provided under signature by the witnesses under penalty of perjury, nor were any of its exhibits formally authenticated.

It is appropriate that none of the parties have laid formal foundations for the testimony of witnesses under the civil rules of evidence, because the civil court rules, including ER 702, do not govern this proceeding. WAC 480-07-495 ("All relevant evidence is admissible if the presiding officer believes it is the best evidence reasonably obtainable, considering its necessity, availability, and trustworthiness. The presiding officer will consider, but is not required to follow, the rules of evidence governing general civil proceedings in nonjury trials before Washington superior courts when ruling on the admissibility of evidence."). Accordingly, Capt. Moore's testimony did not contend that the facts and opinions contained therein were proffered under ER 702.

Nevertheless, while Capt. Moore's testimony does not include a specific contention as asserted in this DR, he possesses extraordinary experience in maritime safety, marine affairs, navigational

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

safety, and the regulation of licensed mariners. He held the highest position of direct port-state control and flag-state authority over vessel issues in the US Coast Guard with respect to their administration in the Puget Sound, was delegated that duty in LA/LB preceding that assignment, supervised two VTS's and waterways management programs in California and Puget Sound and a Regional Exam Center which administers mariner exams in addition to all other marine safety prevention and response missions including casualty investigations of incidents including those being piloted. He earned a master's degree in marine affairs and taught courses that included navigation and marine safety at the US Coast Guard Academy and developed and taught a World Maritime University class. Capt. Moore was highly decorated during his career for his performance of these duties and has continued to receive similar recognition from the maritime and environmental groups for contributions to marine safety and environmental protection including the BC States Oil Spill Task Force Legacy Award, Puget Sound Maritime Achievement Award and the Alaska Maritime Prevention and Response Network, which he Chairs, just received the USCG Benkert Environmental Protection Osprey award, the highest level of award issued by the USCG recognizing one organization every two years nationwide which has produced results in protecting the marine environment and in this case the efforts includes safe routing of vessels. In addition, he has testified before the United States Senate on USCG missions and security efforts post 9-11. Capt. Moore's breadth and depth of experience provides him with expert competence in these specified matters well beyond that of an ordinary layperson.

Moreover, his CV and application of this expertise has continued for more than 17 years in the private sector, including to present, wherein Capt. Moore is involved in policymaking and ratesetting related to numerous aspects of maritime industry operations in the Puget Sound and as the primary advocate for the customers and ratepayers of the state's pilotage system. Given the length and range of Capt. Moore's experience, it would be reasonable to expect the UTC to find his testimony helpful, necessary, available, and trustworthy.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice
DOCKET:	TP-190976		President, PMSA
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 128:

Produce all documents supporting Mr. Moore's qualification under ER 702 to proffer the opinion that the current tariff is "fair, just, reasonable, and sufficient" set forth in Exhibit MM-01, p. 11, lines 23 – 24.

PMSA RESPONSE TO PSP DATA REQUEST NO. 128:

See response to PSP DR No. 127 with respect to ER 702 qualifications.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 133:

Produce all documents supporting Mr. Moore's qualification under ER 702 to proffer legal opinions in testimony, including without limitation Mr. Moore's degree from a law school accredited by the American Bar Association.

PMSA RESPONSE TO PSP DATA REQUEST NO. 133:

See Response to PSP DR No. 127 with respect to ER 702 qualifications.

Subject to and without waiving said objections, PMSA answers as follows:

Capt. Moore did not represent that he earned a law degree.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice
DOCKET:	TP-190976		President, PMSA
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 135:

Produce all documents supporting Mr. Moore's qualifications under Rule 702 to proffer opinion testimony in fields of economics, business administration, accounting, finance, and/or financial analysis, dispatch efficiency or scheduling efficiency.

PMSA RESPONSE TO PSP DATA REQUEST NO. 135:

See Response to PSP DR No. 127 with respect to ER 702 qualifications.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore
REQUESTER:	Puget Sound Pilots		

PSP DATA REQUEST NO. 136:

Produce all academic literature, journals, studies, treaties or other academic publications supporting each of the opinions proffered by Mike More in Exhibit MM-01.

PMSA RESPONSE TO PSP DATA REQUEST NO. 136:

Objection: Overly broad and unduly burdensome; seeks disclosure of sources equally available to PSP.

Subject to and without waiving said objections, PMSA answers as follows:

All specific sources relied upon in Exhibit MM-01 are either cited directly or provided as an exhibit in PMSA's testimony.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 137:

Produce all academic literature, journals, studies, treatises or other academic publications supporting the opinion proffered by Mike Moore that “The Average Revenue per Vessel Move is the most direct, simple, and accurate expression of the application of tariff rates to pilotage service provided to a vessel when it requires to be moved.” Ex. MM-01, p. 12: 16 – 13: 2.

PMSA RESPONSE TO PSP DATA REQUEST NO. 137:

PMSA is not in possession of any responsive documents other than those already produced and attached to previously submitted testimony.

Capt. Moore’s statement is a simple reflection of basic logic. The tariff sets rates paid by vessels for pilotage services; the metric of “Average Revenue per Vessel Move” is the measurement of average tariff rates paid per vessel for pilotage service.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 138:

Produce all academic literature, journals, studies, treaties or other academic publications written by Mike Moore on the subjects of “industry economics” or “metrics for evaluating pilot revenues per unit of work” as referenced in Exhibit MM-01, p. 26: 12-13 and 23-24.

PMSA RESPONSE TO PSP DATA REQUEST NO. 138:

PMSA is not in possession of any responsive documents.

Capt. Moore’s statement is a simple reflection of basic logic and observation of the specifics of the current tariff. The tariff sets rates which create increasing revenues over time as vessels get larger. The metrics of revenue per vessel are based on the data published by the BPC in their Annual Reports and the Board’s regularly updated spreadsheets. PMSA uses the terms and statistics as reported by the State of Washington to evaluate these economics and metrics.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 139:

Produce all academic literature, journals, studies, treaties or other academic publications supporting the “comprehensive” nature of “Average Revenue Per Assignment” and “Average Revenue Per Bridge Hours” as metrics for evaluating the sufficiency of pilotage revenue.

PMSA RESPONSE TO PSP DATA REQUEST NO. 139:

PMSA is not in possession of any responsive documents.

Capt. Moore’s statement is a simple reflection of basic logic and observation of the specifics of the current tariff. The tariff sets rates which create increasing revenues over time as vessels get larger and pilots do less work to earn those revenues. The metrics of revenue per vessel are shown at Exhibits MM-12 through MM-16 and based on the data published by the BPC in their Annual Reports and the Board’s regularly updated spreadsheets. PMSA uses the terms and statistics as reported by the State of Washington to evaluate these economics and metrics.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 141:

Produce all newsletters, press-releases, or other communications from shipping companies calling on the Puget Sound providing information regarding container strings or schedules for 2021-2023.

PMSA RESPONSE TO PSP DATA REQUEST NO. 141:

Objection: This Data Request seeks information that is equally available to PSP from third-party sources.

Subject to and without waiving said objections, PMSA answers as follows:

PMSA is not in possession of any responsive documents.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 142:

Produce all newsletters, press-releases, or other communications from shipping companies calling on the Puget Sound providing information regarding construction of ships that are expected to be put into service in the Puget Sound in the years 2021-2023.

PMSA RESPONSE TO PSP DATA REQUEST NO. 142:

Objection: This Data Request seeks information that is equally available to PSP from third-party sources.

Subject to and without waiving said objections, PMSA answers as follows:

PMSA is aware of, and surmises that PSP is aware of as well, that the construction of ships in the global fleet are not specific to operations in the Puget Sound, and while some percentage of new vessels may call in the Puget Sound during the years 2021-2023, we are unaware of what those expectations are and have no responsive documentation. If there are vessels in the Jones Act trades which are built to be engaged in coastwise trade this information is not produced or created by PMSA and is as equally available to PSP as it is to PMSA.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 149:

Produce all documents establishing or demonstrating a causal relationship between a decrease in assignments per pilot and an increase in revenue per assignment as alleged by Mr. Moore in Exhibit MM-01, p. 44, lines 6-7.

PMSA RESPONSE TO PSP DATA REQUEST NO. 149:

This Data Request misstates Capt. Moore's testimony. Capt. Moore did not make any allegations regarding causation, but instead made a statement that is a formulaic truism, at page 44, lines 6-7:

“So long as average revenues per assignment are increasing and the average number of pilot assignments is flat or decreasing, pilots are earning more while working less.”

Capt. Moore's statement above is a simple reflection of basic logic and it is followed in his testimony after lines 6-7 by his observation of the fact that this actually occurs under the current tariff. The demonstration of pilots earning more while working less is shown at Figure V, based on Exhibits MM-13 and MM-20, which are based on the data published by the BPC in their Annual Report and the Board's regularly updated spreadsheets.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 155:

Is it PMSA's contention that mandatory rest periods adopted in RCW 88.16.103 via HB 1647 had no impact on the number of assignments a pilot may safely perform?

PMSA RESPONSE TO PSP DATA REQUEST NO. 155:

Objection: Calls for speculation; and relies on facts not in evidence.

Subject to and without waiving said objections, PMSA answers as follows:

PMSA sought the Data necessary to perform the actual analysis that PSP seeks an answer to here (PMSA Data Request to PSP No. 86 ("...please provide, in a searchable spreadsheet format, the actual available number of on-duty pilots each day and the reasons for on-duty pilot not being available for duty each day...")), but PSP Objected to the provision of this data as an "undue burden." (PSP Response to PMSA DR No. 86)

PSP further objected to this request, specifically, because "providing the reasons for on-duty pilots 'not being available for duty each day' would require PSP to identify every single time an on-duty pilot received a mandatory rest break" and that "PSP does not possess a record matching the description of records sought by this request and is not required to create new records pursuant to WAC 480-07-400." (PSP Response to PMSA DR No. 86)

Without access to PSP data regarding the number of pilots actually available to pilot or when a rest period might have occurred, it is impossible for PMSA to answer this DR. Moreover, PMSA would affirmatively note that it is equally impossible for PSP to prove that the change in mandatory rest periods actually had any impact on the number of assignments that any pilot may safely perform because, according to its responses to PMSA's DR No. 86, it does not possess any such records and it would be unduly burdensome to create a searchable spreadsheet for the purpose of such an analysis.

Despite being denied this specific information regarding PSP's actual watch schedule and actual availability of pilots to be scheduled for assignment, PMSA answers as follows: PMSA's testimony (Exh. MM-01 pp. 98-102) relies on PSP's data (Exh. IC-01) to conclude that actual rest period delays occurred in less than 1% of vessel transits. With respect to the actual number of assignments that pilots are safely performing and capable of safely performing, PMSA's testimony is explicit in its opinion that such delays are much more likely a function of an inefficient callback and watch standing systems than any change in the statutory minimum requirement regarding pilot rest periods.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 157:

Has PMSA or its representatives performed any analysis of the impacts of the rest policies implemented by PSP in 2015 on pilot workloads or availability for working assignments? If so, produce all such analysis.

PMSA RESPONSE TO PSP DATA REQUEST NO. 157:

Objection: Calls for speculation; and relies on facts not in evidence.

Subject to and without waiving said objections, PMSA answers as follows:

See Responses to Data Request No. 155 and No. 156.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 165-177

DATE PREPARED:	June 24, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore
REQUESTER:	Puget Sound Pilots		

PSP DATA REQUEST NO. 166:

Regarding Mr. Moore's statement that "The PSP watch system is inefficient" in Exhibit MM-01, p. 48, lines 4-5, please produce all documents supporting Mr. Moore's qualifications under ER 702 to proffer opinion testimony regarding the subjects of pilot staffing, scheduling, and/or dispatch efficiency.

PMSA RESPONSE TO PSP DATA REQUEST NO. 166:

Please see Response to PSP Data Request 127.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 165-177

DATE PREPARED:	June 24, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 167:

Regarding Mr. Moore's statement that "[t]he PSP watch system is inefficient" in Exhibit MM-01, p. 48, lines 4-5, produce all documents and/or analyses performed by Mr. Moore or anyone else on behalf of PMSA relating to the efficiency of PSP's watch schedule. If such analysis resulted in any proposed alternative watch schedule, please produce copies of any such proposals.

PMSA RESPONSE TO PSP DATA REQUEST NO. 167:

The Pilotage Act requires consideration of the optimization and efficiency of the pilotage system and, consistently, PMSA has provided numerous comments about inefficiencies in making pilots available for assignment in numerous setting the number of pilots submissions at BPC hearings and in BPC committees formed to address the setting of the number of pilots process and in addressing fatigue management. Comments included concerns about two watch system inefficiencies, management inefficiencies, and not requiring half of pilots to actually be available for assignment. Please find attached all documents regarding comments on PSP watch system inefficiency at Bates Numbers PMSA_000698 to PMSA_000765.

PMSA has not performed any formal analysis of the PSP watch schedule and notes that it is not PMSA's responsibility to implement the Pilotage Act requirements around optimization and efficiency nor to design specific watch schedule and dispatch policies. However, with respect to some specific observations of changes which would improve pilot availability and efficiency, PMSA has commented that if PSP instituted a rotation with multiple transition days such a change would provide improved pilot availability instead of one transition day every two weeks on what historically is a low assignment day of the week. PMSA has also pointed out that the transition day essentially double counts on watch days thereby creating earned time off or vacation days that according to start and stop dates on pilot activity reports, totals up to 18 days per pilot in addition to all the respite days. This further reduces on watch pilot availability well below "half" time.

Finally, PMSA would further note that it is impossible for any member of the public – or PSP for that matter – to truly analyze and evaluate efficiency in the context of pilot availability because, according to PSP there is no such record which demonstrates "the actual available number of on-duty pilots" (PSP Response to PMSA DR No. 86). See response to Data Request No. 155.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 165-177

DATE PREPARED:	June 24, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 170:

Does Mr. Moore hold himself out to be an expert in fatigue and /or fatigue management or fatigue mitigation? If so, produce all records demonstrating his qualifications under ER 702 to proffer opinion testimony regarding the impacts of pilot scheduling on pilot fatigue.

PMSA RESPONSE TO PSP DATA REQUEST NO. 170:

Please see Response to PSP Data Request 127.

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 165-177

DATE PREPARED:	June 24, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 175:

Regarding the statements of Mr. Moore in Exhibit MM-01, p. 101, lines 7-11, produce all documents and analyses that demonstrate any of the delays in 2018 were caused by the following factors:

- (a) Staffing management;
- (b) Efficiency;
- (c) "Less productive pilots' unwillingness to make themselves available.

PMSA RESPONSE TO PSP DATA REQUEST NO. 175:

Capt. Moore provided citations to all documents and information with respect to support of his testimony on this topic at Exh. MM-01 pg. 98-102. With respect to the question of efficiency, please see response to Data Request No. 167.

Moreover, according to PSP there is no such record which demonstrates "the actual available number of on-duty pilots" including accounting of fatigue and rest rules (PSP Response to PMSA DR No. 86). See response to Data Request No. 155.

PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS 56-126

DATE PREPARED: March 3, 2020	WITNESS: Ivan Carlson
DOCKET: TP-190976	RESPONDER: Ivan Carlson
REQUESTER:	Puget Sound Pilots

DATA REQUEST NO. 86: Regarding Exh. IC-1T, p. 3 lines 6-24 and p. 4 lines 1-2, please provide, in a searchable spreadsheet format, the actual available number of on-duty pilots each day and the reasons for on-duty pilots not being available for duty each day from 2018 to present.

RESPONSE TO DATA REQUEST NO. 86:

Objection. PSP does not possess a record matching the description of records sought by this request and is not required to create new records pursuant to WAC 480-07-400. Further, providing the reasons for on-duty pilots “not being available for duty each day” would require PSP to identify every single time an on-duty pilot received a mandatory rest break or was on major medical leave. Thus, responding to this request would create an undue burden on PSP. By way of additional objection, information regarding the periods of time during which pilots were on major medical leave is available to the PMSA through monthly reports of the Board of Pilotage Commissioners.

Subject to and without waiving the foregoing objections, PSP is responding to provide the number of active duty pilots during each watch period for the period of 2018-2019.

The following are the number of pilots who entered rotation for each of the 15-day watch periods commencing identified:

1/9/18	1/23/18	2/6/18	2/20/18	3/6/18	3/20/18	4/3/18	4/17/18	5/1/18
21	23	21	23	21	22	22	21	22
5/15/18	5/29/18	6/12/18	6/26/18	7/10/18	7/24/18	8/7/18	8/21/18	9/4/18
21	22	19	22	18	21	21	19	22
9/18/18	10/2/18	10/16/18	10/30/18	11/13/18	11/27/18	12/11/18	12/25/18	1/8/19
19	20	19	20	20	19	20	19	22
1/22/19	2/5/19	2/19/19	3/5/19	3/19/05	4/2/19	4/16/19	4/30/19	5/14/19
19	22	19	21	21	20	21	20	21
5/28/19	6/4/19	6/18/19	7/9/19	7/23/19	8/6/19	8/20/19	9/3/19	9/17/19
20	23	20	23	18	22	20	21	23

PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS 56-126

10/1/19	10/15/19	10/29/19	11/12/19	11/26/19	12/10/19	12/24/19
21	22	20	23	21	21	21