

PMSA MOTION TO STRIKE - EXHIBIT B-1  
PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS NOs. 36-55

DATE PREPARED: February 18, 2020	WITNESS: CAPT. GEORGE QUICK
DOCKET: TP-190976	RESPONDER: CAPT. GEORGE QUICK
REQUESTER: PMSA	PUGET SOUND PILOTS

**PMSA DATA REQUEST NO. 46:** Please list all state pilots associations with whose pilot compensation levels Capt. Quick has become familiar, as referenced at Exh. GQ-1T p. 11 line 3.

**RESPONSE TO DATA REQUEST NO. 46:**

Captain Quick is generally familiar in his position with MM&P with pilot compensation levels, some criteria used by the various ratesetting bodies and various distinctions therein in the following states, ports and/or harbors which familiarity also is not necessarily predicated on explicit publicly available documents and data or necessarily established by writings:

South West Alaska, AK  
Columbia River, OR  
San Francisco, CA  
Puget Sound, WA  
Hawaii, HI  
Sandy Hook, NY/NJ  
Maryland, MD  
Delaware, DE  
Pennsylvania, PA  
Galveston, TX  
Houston, TX

Sabine River, TX  
Lake Charles, LA  
Associated Branch, LA  
Crescent River, LA  
NOBRA, LA (New Orleans/Baton Rouge)  
Tampa, FL  
Miami, FL  
Port Everglades, FL  
Jacksonville, FL  
Savannah, GA  
Charleston, SC  
Virginia, VA

PMSA MOTION TO STRIKE - EXHIBIT B-2  
PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS NOs. 36-55

DATE PREPARED: February 18, 2020	WITNESS: CAPT. GEORGE QUICK
DOCKET: TP-190976	RESPONDER: CAPT. GEORGE QUICK
REQUESTER: PMSA	PUGET SOUND PILOTS

**PMSA DATA REQUEST NO. 47:** Please provide copies of all documents showing data for the years 2010 to present of the pilot compensation levels related to your response to Request No. 46.

**RESPONSE TO DATA REQUEST NO. 47:**

Objection. This request is overly broad and is not properly limited in time. Specifically, documentation of historic and annual pilot compensation levels from 2010 to present would be unreasonably cumulative and duplicative, not to mention voluminous and are not beneficial to the adjudication of this proceeding; stale pilot income data from 2010 have no relevance to a 2020 rate proceeding. PSP has produced the only known publicly available information on state pilot compensation for comparable pilotage groups for the pertinent test year or best current available information in its filing in November and in responses to data requests. This request is therefore also unreasonably cumulative of other requests, in violation of WAC 480-07-400(3). Moreover, Captain Quick has already indicated in response to Staff Data Request No. 11, that there is relatively little published information on individual net pilot compensation and even with published comparable rate information such as that provided in PSP's filing in November, pilot compensation in all jurisdictions will understandably fluctuate based on variations in traffic levels, ship profiles, pilot complement and operating expenses. Again, Captain Quick's familiarity with pilot compensation levels nationally including retirement program familiarity, is the result of his role for nearly half a century as Vice President of the American Pilots' Association and in his VP role in the Masters, Mates and Pilots Association in liaising with the 24 coastal states pilot associations and their membership.

PMSA MOTION TO STRIKE - EXHIBIT B-3  
PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS NOs. 36-55

DATE PREPARED: February 18, 2020	WITNESS: CAPT. GEORGE QUICK
DOCKET: TP-190976	RESPONDER: CAPT. GEORGE QUICK
REQUESTER: PMSA	PUGET SOUND PILOTS

**PMSA DATA REQUEST NO. 48:** Please provide copies of all documents reflecting the “feedback from various pilot associations around the country as to basic outlines of their compensation including particular pension plans or retirement programs and working conditions,” as referenced at Exh. GQ-1T p. 1 lines 18-20.

**RESPONSE TO DATA REQUEST NO. 48:**

Objection. To the extent written records exist of information supplied between Captain Quick and various national pilot associations’ pension or retirement programs, this request is over broad because it inherently seeks for Captain Quick to produce literally every email or other communication he has ever initiated or received on the subject of pilot pensions and retirement. Searching for and locating such communications would require a manual review of Captain Quick’s emails, which is necessarily a burdensome task. However, the value to the Commission in receiving into evidence such potential documents would be non-existent and far outweighed by the burden of providing a comprehensive response to this request. Moreover, the “feedback” referred to in the above testimony was referring to internal conversations both in person and by telephone responding typically to inquiries by Captain Quick or through conversations with various national pilot association members (at association meetings) about their particular plans, benefits or working conditions over the years. Obviously, in his role with MM&P, which he describes more particularly at Ex. GQ-1T, lines 13,14, it is an obvious function of the position and that “feedback” and opinion was not inferred necessarily to be document-based.