

PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS Nos. 297-306

DATE PREPARED: December 28, 2022 DOCKET: TP-220513 REQUESTER: Pacific Merchant Shipping Association ("PMSA")	WITNESS: CAPTAIN DEBORAH DEMPSEY RESPONDER: CAPTAIN DEBORAH DEMPSEY PUGET SOUND PILOTS DATE: January 20, 2023 TEL: 503-791-1379 EMAIL: compassrose@charter.net
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PMSA DATA REQUEST NO. 297: Regarding your testimony at Exh. DDD-01T 6:21–24, that Puget Sound Pilots are “a national leader as demonstrated by the length of time and scope of effort that PSP has been making to interest young women” in becoming a pilot, admit that in January 2015 Capt. Katherine Sweeney, who had sought to become the first female Puget Sound Pilot, was awarded \$3.6 million after a King County Superior Court jury determined that she was the subject of gender discrimination based on actions taken by the Training and Evaluation Committee of the Board of Pilotage Commissioners that willfully and wrongfully denied her a pilot’s license based on her gender.

RESPONSE:

Admit.

PMSA DATA REQUEST NO. 298: Regarding Exh. DDD-01T 6:24–7:6, admit that the rates paid for pilotage services to pilots by vessels in the Puget Sound are paid equally according to the tariff regardless of all of the following factors: range of ship type experience of pilots, seagoing vessel experience of pilots, towboat vessel experience of pilots, ferries experience of pilots, ship handling experience of pilots, gender of pilots, and racial diversity of pilots.

RESPONSE:

Admit.

PMSA DATA REQUEST NO. 299: Regarding Exh. DDD-01T 6:24–7:6, admit that the trainee application and license qualification criteria for a Washington state-licensed Puget Sound pilot qualified to provide services to vessels in the Puget Sound charged according to the rates under the tariff are the same regardless of all of the following factors: range of ship type experience of the pilot trainee or pilot, seagoing vessel experience of the pilot trainee or pilot, towboat vessel experience of the trainee pilot or pilot, ferries experience of the trainee pilot or pilot, ship handling experience of the trainee pilot or pilot, gender of trainee pilot or pilot, and racial or ethnic background of the trainee pilot or pilot.

RESPONSE:

Admit.

PMSA DATA REQUEST NO. 300: Regarding Exh. DDD-01T 6:16, 7:20–21 and your “regular contact with female pilots around the country” and statement that “Houston pilots are among the leading pilot groups in the US in terms of their number of female pilots,” please describe both of the following: 1) the number of total female pilots of which you are aware; 2) an accounting of the pilotage grounds in which they work; and, 3) specifically with respect to Houston pilots, the year in which each female Houston pilot was licensed.

RESPONSE:

From recollection only, I am not in a position to accurately respond to this Data Request.

PMSA DATA REQUEST NO. 301 Regarding Exh. DDD-01T 7:17–21, admit that the data regarding income and benefits for Houston Pilots is not included in the PSP Petition and, specifically, is omitted from the testimony of Mr. David Lough, *see* Exh. DL-06.

RESPONSE:

Admit. It is my understanding that the Houston Pilots do not disclose any data regarding their income and benefits.

PMSA DATA REQUEST NO. 302: Regarding Exh. DDD-01T 7:17–21, if you have first-hand knowledge of the Income and Benefits of the Houston Pilots, please provide that data regarding income and benefits along with Houston Pilots’ workload data, including all original source documentation.

RESPONSE:

I do not have first-hand knowledge of the income and benefits of the Houston Pilots.

PMSA DATA REQUEST NO. 306: Regarding Exh. DDD-02, and your experience, which included service as a Pilot Commissioner on the Oregon Board of Maritime Pilots in 2000-2005, please provide all of the following:

- 1) Describe the total staffing level of the pilot corps and the level of diversity for the Columbia River Bar Pilots and the Columbia River Pilots in 2000.
- 2) Describe the total staffing level of the pilot corps and the levels of diversity for the Columbia River Bar Pilots and the Columbia River Pilots in 2005.
- 3) Do you agree that the testimony of Capt. Dan Jordan is a fair representation of the rate and pilot income environment during your time on the Oregon Board of Maritime Pilots (Exh. DJ-01T 12:13–15 (“During most of the first decade of the 2000s, which was a period of considerable rate instability, the CRBP fell behind much of the West Coast in terms of pilotage compensation and benefits.”))?

RESPONSE:

- 1) I did not maintain records related to the total staffing level of the pilot corps and level of diversity for the Columbia River Bar Pilots and the Columbia River Pilots in 2000. However, my recollection is that the Columbia River Bar Pilots had one female pilot in 2000 and the Columbia River Pilots had one female pilot and one Native American pilot.
- 2) I did not maintain records related to the total staffing level of the pilot corps and level of diversity for the Columbia River Bar Pilots and the Columbia River Pilots in 2005. However, my recollection is that the Columbia River Bar Pilots had one female pilot in 2005 and the Columbia River Pilots had one female pilot and one Native American pilot.
- 3) Yes.