

**PMSA DATA REQUEST NO. 294:** Regarding Exh. AJ-01T 5:13–17, please admit all of the following for the duties of a Chief Mate:

- 1) Your 75 duty days “on-duty” are 75 consecutive days “on” followed by 75 consecutive days “off”;
- 2) Every day that you are “on-duty” includes a 12-hour work shift per day;
- 3) On occasion, some “on-duty” days require work in excess of 12 hours; and,
- 4) All days “on-duty” are served on board a vessel, including while the vessel is at sea.

For any of these provisions which are denied, please provide a more accurate description of your duty requirements.

**RESPONSE:**

- 1) Admit. However, it is common for construction delays in the cable ship sector of the maritime industry to impact this schedule. For example, my last on-duty period was 105 days, which was preceded by 77 off-duty days.
- 2) Admit.
- 3) Admit.
- 4) Admit.

**PMSA DATA REQUEST NO. 295:** Regarding Exh. AJ-01T 4:22–5:9, please describe each of the following:

- 1) The “on-duty” and “off-duty” schedule for the Captain, including total days on-duty per year;
- 2) The work shift hours of the Captain when standing “one dynamic positioning watch per day”; and,
- 3) The time commitment when required to be present on the bridge for specific work or specific maneuvers in pilotage waters.

**RESPONSE:**

- 1) Same as my schedule referenced in response to DR 294. In 2021 and 2022, both captains under which I served worked schedules very close to equal amounts of time on/time off.
- 2) When a vessel is engaged in cable operations, the captain works 12 hours per day on-duty, which includes four hours of watch standing.
- 3) These time commitments are highly variable depending upon the circumstances.

**PMSA DATA REQUEST NO. 296:** The testimony of Capt. Ivan Carlson at Exh. IC-01T 10:1–14 references a future pilot career for Chief Mate Alysia Johnson. With respect to this testimony, please respond to each of the following:

- 1) Are you currently or have you been previously an applicant to a pilot training program? If so, which pilotage ground(s)?
- 2) If not, are you eligible to currently apply to a pilot training program? If so, which pilotage ground(s)?
- 3) If neither of the preceding, in what year would you predict that you would be eligible to apply to the Puget Sound Pilot training program?

**RESPONSE:**

- 1) No.
- 2) Considering my current level of qualifications as a mariner, I believe that I may be eligible to currently apply to a number of pilot training programs in the United States, but I have not researched any specific programs.
- 3) I have not performed the research necessary to respond to this question.