

February 16, 2011

MEMORANDUM

TO: National Quality Steering Committee (QSC)

FROM: CDR Gregory Case, Co-Chair; Lynn M. Muench, Co-Chair
Bridging and Implementation Team (BAIT) Working Group (WG) #6

RE: BAIT WG #6 Report:
Towing Vessel National Center of Expertise (TVNCOE) Work Plan

Attached please find a report from BAIT WG #6. Per the terms of the group's charter and in keeping with the direction of the National QSC, the group developed recommendations to be considered for inclusion in the TVNCOE's Business Plan and ongoing efforts as they relate to the Towing Vessel Bridging Program.

The members of the group deliberated and came up with a number of recommendations for making the center an entity that can assist both the Coast Guard and the towing industry, particularly as the industry moves toward inspection. Some of the suggestions within the report have already been implemented.

The BAIT WG #6 requests the QSC's approval of this report. Members of the group will work together to ensure the ideas contained in the report that are adopted by the Coast Guard are put into place in a manner that allows for adequate oversight and periodic review by the QSC.

QSC members should feel free to contact either one of us with questions or comments.



CDR Gregory Case, TVNCOE



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February 16, 2011

MEMORANDUM

TO: Bridging and Implementation Team (BAIT) Working Group (WG) #6 Members

FROM: Lynn M. Muench

CC: National Quality Steering Committee

RE: BAIT WG #6 (Towing Vessel National Center of Expertise)

On June 29, BAIT WG #6 held a meeting in New Orleans, LA. WG #6 was established to provide input to the U.S. Coast Guard's Towing Vessel National Center of Expertise (TVNCOE) regarding its mission, activities and priorities. Industry representatives attending included Chris Peterson, Crowley Maritime Corporation; Jerry Gallion, Kirby Corporation; Fred Nyhuis, Marathon Petroleum Company; Jason Adams, Ingram Barge Company; Tom Sullivan, K-Sea Transportation Partners, L.P.; Lee Nelson, Upper River Services; and, Mike Quinton, Golding Barge Line, Inc. Coast Guard personnel attending the meeting included CDR Greg Case and Roy Murphy, TVNCOE; LCDR Craig Toomey and Mike White, Eighth District; and, CDR Paul Thorne and Pat Lee, Coast Guard Headquarters. AWO staff included Lynn Muench, Mark Wright and Mary McCarthy. QAT members who were unable to attend the meeting included Matt Holzhalb, E.N. Bisso & Son, Inc. and Gregg Thauvette, The Great Lakes Group.

The BAIT WG #6 meeting began with an overarching philosophical discussion on the future vision of the TVNCOE. Unlike all other NCOEs, the TVNCOE has a unique challenge because Subchapter M, the towing vessel inspection regulations, has not yet been published. CDR Thorne praised the towing vessel industry for being more engaged with the TVNCOE than other industries are typically engaged with their respective NCOEs. Overall, the group agreed that the TVNCOE's overarching philosophy should include the following:

- Act as the policy vanguard for all towing vessel issues;
- Be a clearinghouse for information relevant to the towing vessel industry;
- Be a clearinghouse for all individuals interacting with the towing vessel industry, especially, at first, Coast Guard towing vessel examiners;
- Ensure the development of towing vessel expertise among TVNCOE personnel;

- Be the conduit for communication between industry and the Coast Guard concerning all issues that arise concerning towing vessels, towing vessel inspection, regulatory interpretations and policy;
- Act as the pulse-taker of the industry for the Coast Guard and vice versa;
- Provide transparent interface between the towing vessel industry and the Coast Guard to ensure clear and timely guidance;
- Be an advocate for the anticipated new paradigm of a Subchapter M that will embrace a third-party audited safety management system as the centerpiece of inspection, versus traditional inspection; and,
- Be a catalyst for new innovations and interpretations as inspection is implemented.

During the meeting, the group went over the discussion topics listed in the charter and agreed on the following recommendations for the TVNCOE's business plan.

Task a: The level and regularity of interaction between Coast Guard towing vessel examiners and TVNCOE personnel.

- Training
 - The TVNCOE should partner with Training Center Yorktown in the development of training courses for examiners.
 - It is essential that the TVNCOE has a key role in the development, management and oversight of course development for examiners and, as the TVNCOE matures, for other Coast Guard personnel that interface with the towing vessel industry.
 - Current training should focus on Subchapter C (regulations already in place), but the CG must be poised to include the anticipated Subchapter M regulations, including the recommendations of the Towing Safety Advisory Committee when the time is appropriate.
 - Training must be routine and scheduled.
 - While the training should be consistent, it should stress that there are diverse business lines within the industry and a "one size fits all" approach to towing vessel operations is flawed and unrealistic.
 - Industry should be part of the course development process (through BAIT) and should be a part of all training.
 - The TVNCOE must be engaged in auditing the examiners.
- The TVNCOE will provide a means for contacting its personnel (management and subject matter experts) so that the towing vessel industry can easily convey feedback and concerns. Avenues include published phone numbers and the TVNCOE web site.

Task b: Identify how to ensure appropriate focus is given to all sectors and geographic areas.

- The TVNCOE should establish a mechanism for interface with the towing vessel industry on a regular basis - by phone, email and other technology methods to ensure appropriate focus on all geographic areas.

- The TVNCOE should establish a mechanism for consistent outreach to the towing vessel industry, including a “road show” to interact with towing vessel owners/operators throughout the country, as well as webinars and e-meetings.

Task c: Define the initial extent that the TVNCOE will interface with industry groups to foster ongoing dialogue.

- The TVNCOE staff should do an initial promotional tour to establish industry expectations and get feedback, and then maintain outreach with the towing vessel industry over time by speaking to large groups on a regular basis.
- The TVNCOE staff will make it a priority to attend and present at large industry meetings, such as those listed below, and also target geographic “hub” areas every 12 to 18 months in order to interface with smaller towing vessel owners/operators.
 - WorkBoat Show
 - Inland Waterways Conference
 - Industry Day(s) in various Districts
 - Connecticut Tug and Barge Conference
 - Pacific Maritime Expo
- The TVNCOE should consider targeting local towing vessel industry events, such as meetings of the Texas Waterway Operators Association (TWOA) and the AWO Safety Committees.
- When appropriate at such meetings, the TVNCOE should both speak and have a booth in order to increase interaction.
- When planning to speak at a meeting, the TVNCOE should send out a mass email about the meeting to the towing vessel owners/operators in that Coast Guard Sector or within driving distance of the Sector (Mike White currently has those lists for the Eighth District – other districts should establish similar lists).
- The TVNCOE should consider webinars and e-meetings to reach smaller towing vessel owners/operators.
- The TVNCOE should ensure that examiners are an extension of the TVNCOE in that they explain the center’s mission, solicit feedback, and pass out informational brochures when visiting towing vessel owners/operators.
- The TVNCOE should ensure that brochures and other Coast Guard documents are readily accessible on the TVNCOE web site.

Task d: Define the initial extent that the TVNCOE will interface with Coast Guard field units to ensure consistency of UTV examinations.

- While the TVNCOE should ensure that policies are consistent, it should also ensure that blind consistency doesn’t become bad policy.
- The TVNCOE should “audit the auditors” (i.e., the towing vessel examiners). This will ensure exams are conducted in a manner consistent with policy direction.
- The TVNCOE web site must be up-to-date and include important operational information for the towing industry.

- The TVNCOE should establish a timely mechanism to keep field units informed. This could be in the form of an e-newsletter.
- The TVNCOE should establish regular outreach by the TVNCOE to field units, especially Sector Commanders, to minimize loss of institutional memory and other issues related to personnel rotation.
- The TVNCOE should utilize and expand current training and meetings, such as Yorktown training and the Sector Commanders conference, to interface with field units and the towing vessel industry.

Task e: Define the role of the TVNCOE leading up to the implementation of the towing vessel inspection regulations, and how will it change during and after implementation.

- The TVNCOE will be responsible for assisting in the development and oversight of the training of local Coast Guard personnel with responsibilities under Subchapter M.
- The TVNCOE will be the advocate as it is outlined in the future Subchapter M regulations for the new towing vessel inspection paradigm, specifically the reliance on safety management systems and risk-based analysis.
- The TVNCOE should make recommendations to Headquarters, and facilitate intra-Coast Guard dialogues with respect to towing vessel policy decisions, including decisions made by Officers in Charge, Marine Inspection (OCMIs).
- The TVNCOE should research all potential Coast Guard policy decisions that will impact the towing industry and recommend actions by the Coast Guard.

Task f: Identify the best practical mechanism(s) to ensure the transparency of the TVNCOE's outreach efforts to stakeholders.

- The TVNCOE should use its web site, webinars and e-meetings to conduct proactive outreach to stay in contact with stakeholders.
- The TVNCOE should be a clearinghouse for communication between the towing vessel industry and the Coast Guard and among Coast Guard units (e.g. Sectors and Marine Safety Units).
- The towing vessel industry should provide input into training curriculum, policy formation, etc.
- The TVNCOE should establish an industry advisory steering group that provides timely feedback on the quality and effectiveness of the TVNCOE's work.

Task g: Identify the best practical mechanism(s) for companies and mariners, as well as the broader public, to interact with the TVNCOE on ongoing or timely issues affecting towing vessels.

- The TVNCOE should establish a mechanism for interfacing with the towing vessel industry on a regular basis - by phone, email and other technology methods.
- The TVNCOE should establish an online system for towing vessel owners/operators to submit reviews of Coast Guard examinations.

- The TVNCOE should establish processes and procedures within the Mission Management System (MMS) to ensure transparency and continuous improvement.
- The TVNCOE must provide a means for contacting its personnel (management and subject matter experts) so that the towing vessel industry can easily convey feedback and concerns, via published phone numbers or the TVNCOE website.
- The TVNCOE should establish a national feedback line that will facilitate corrective actions in response to concerns from the towing vessel industry and Coast Guard personnel.

Task h: Identify the statistical information on towing vessels and towing vessel safety that will be housed at the TVNCOE.

- Towing vessel marine casualty and safety statistics are currently maintained by Coast Guard headquarters staff. The TVNCOE should not duplicate this effort, although future interpretation of those statistics may be an appropriate responsibility for the TVNCOE.
- As appropriate under the future regulations, the TVNCOE should develop auditor qualification requirements, verify auditors meet those requirements, and store all relevant information pertaining to qualified auditors for industry review upon request.

Task i: Other issues the group deems valuable to discuss and provide recommendations on.

- WG # 6 should reassemble to provide ongoing collaboration to assess the above issues and more after the Subchapter M notice of proposed rulemaking is published, as commanders transition, on a regular basis after Subchapter M is implemented, and on an annual basis thereafter.
- WG #6 will provide suggested updates to the TVNCOE's mission and vision statements (see Appendix A).
- It is critical that the Coast Guard ensures continuity, at the TVNCOE and at field units charged with implementation of towing vessel examinations and Subchapter M, by keeping trained professionals in the positions for which they were trained, and not replacing them with untrained personnel after a certain amount of time.
- In order to raise the prestige and authority of the TVNCOE, the group was interested in exploring if the Detachment Chief's rank could be elevated, and the tour of duty lengthened.

CDR Case and Ms. Muench will provide a preliminary report and the proposed updated mission and vision statements at the National Quality Steering Committee meetings on August 4, 2010 and on February 23, 2011. The TVNOCE also committed to having the web site up by that date. The web site is flourishing and is being widely advertised.

Finally, the work group committed to working together to ensure that industry members participated in the upcoming examiner training being held by the Coast Guard. This training was held during subsequent sessions in Paducah, KY in August and September. There was strong industry participation at these sessions.

Appendix A
Towing Vessel National Center of Expertise

Vision

Current: The Towing Vessel National Center of Expertise (TVNCOE) will be the Coast Guard's forward-thinking component on the towing industry to keep all Towing Vessel program stakeholders well-prepared to handle current and future needs.

Proposed: The TVNCOE will be the hub for all Coast Guard training and policy decisions impacting towing vessels and their crews; will ensure that the towing industry is well informed of Coast Guard actions and policies that will impact industry operations; and, will be an advocate within the Coast Guard for consistency and for the new inspection paradigm reflected in the towing vessel inspection regulations.

Mission

Current: The TVNCOE will maintain trained experts on the towing industry to serve as in-house consultants to the Coast Guard and as participants in technical forums and decision-making collaborations; provide technical advice to both the industry and the Coast Guard; and, increase and maintain the Coast Guard's collective competency and capacity to professionally engage with the towing vessel industry.

Proposed: The TVNCOE will maintain a constructive, robust working relationship with the industry; advocate for a consistent implementation of the towing vessel inspection regulations; advocate for a new inspection paradigm for towing vessel examiners and other Coast Guard personnel that interface with the industry; utilize industry experts to ensure that the TVNCOE has the benefit of industry technical and operational knowledge; develop, manage, provide and continually improve training programs focused on the towing industry; and, serve as a resource for, and interface between, the Coast Guard and industry.

Appendix B
Towing Vessel National Center of Expertise Proposed Mission and Vision Statements (alternative to appendix A, pending industry approval)

Mission:

Our mission is to lead CG and Industry towards enhanced towing vessel safety. We do this by integrating subject matter expertise, training, partnerships and policy. We are the “one-stop” resource for everything towing vessel safety.

-or-

We are leaders in towing vessel safety. The four points of our compass rose are policy vanguard, partnership, training and expertise. We are the “one-stop” resource.

Vision:

Be the experts of towing vessel safety, first nationally, then worldwide.

Values:

Our work is guided by the Coast Guard’s core values of Honor, Respect and Devotion to Duty. We are further guided by these four areas of emphasis:

- **Partnership** – Open and honest exchange with our stakeholders.
- **Proactive** – Manage issues, not crisis
- **Consistency** – Through quality training and effective customer service we aim to ensure consistency in the application of regulations and policies.
- **Customer Service** – Customers are why we exist; we strive for excellence in customer service to both Industry and CG members.