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November 18, 2019

RDML Richard V. Timme
Assistant Commandant for Prevention Policy
U.S. Coast Guard
2703 Martin Luther King Jr. Avenue, SE
Washington, DC 20593

Re: Crediting Recent Sea Service of Personnel
Serving on Vessels of the Uniformed
Services (Docket No. USCG-2017-1025)

Dear Rear Admiral Timme:

The American Waterways Operators is the national trade association for the tugboat, towboat and barge industry. AWO's more than 300 member companies own and operate barges and towing vessels on the U.S. inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; and the Great Lakes. The tugboat, towboat and barge industry provides family-wage jobs and ladders of career opportunity for more than 50,000 Americans, including 38,000 positions as mariners on board our vessels who safely, securely and efficiently move more than 760 million tons of cargo critical to the U.S. economy.

On behalf of AWO's member companies, thank you for the opportunity to review and comment on the Coast Guard's implementation of a statute that increases the period within which sea service aboard vessels of the armed services can be used to qualify for a Merchant Marine Credential (MMC) with a national officer endorsement.

Section 305 of the Howard Coble Coast Guard and Maritime Transportation Act of 2014 directed the Coast Guard to extend the period of time that servicemembers could accrue creditable sea service aboard vessels of the uniformed services from three years to seven years. This change was enacted to account for military career paths that included sea service but culminated with assignment to a shoreside unit. By establishing a seven-year period within which a servicemember could attain the required 90 days of sea service for an MMC with a national officer endorsement, Congress intended to increase both the career opportunities for veterans and the number of qualified mariners for the domestic maritime industry. AWO members support veteran hiring and appreciate Congress' and the Coast Guard's efforts to eliminate impediments to veterans entering the merchant marine workforce. AWO also appreciates the Coast Guard's work to implement Congress' mandate through CG-CVC Policy Letter 15-03 until the current rulemaking is finalized.

In addition to seeking input on the implementation of Section 305, the Coast Guard requested public comment on two questions regarding sea service more generally. We welcome the opportunity to offer our feedback on these questions.

1. Should the period for “recent” service be extended to seven years for all national officer endorsements?

The period for recent service should be extended to seven years for all original national officer endorsements. This would create an even standard for civilian mariners and for veterans with service on vessels of the uniformed service when applying for MMCs with national officer endorsements. Just as servicemembers can face challenges in obtaining recent sea service within three years prior to applying for a national officer endorsement, civilian mariners can also face challenges caused by changing industry and employment markets or career and family situations that may temporarily move their career shoreside. Extending the recent sea service period to seven years for all original national officer endorsements is an equitable solution that allows every applicant to rely on a fuller spectrum of their career experience without negatively impacting safety.

However, recent sea service periods should not be extended to seven years for the renewal or raise of grade of MMCs with national officer endorsements.

The existing five-year recent sea service period for renewal gives mariners significantly more time to obtain the required sea service than the current three-year period for original and raise of grade endorsements. If mariners do not have the required sea service within that five-year period, they are able to renew their MMC and national officer endorsement by taking an open book exam or completing a refresher training course, among several other options that demonstrate their continued proficiency. Those options already provide a reasonable process for mariners who have not worked on a vessel in a five-year time period to return to employment and negate any need to extend the time period from five years to seven years.

The current three-year recent sea service period for raise of grade also should not be extended. When a mariner raises the grade of his or her national officer endorsement, he or she takes on a heightened level of responsibility. Whether it is an apprentice mate (steersman) becoming a mate (pilot) or a mate (pilot) becoming a master of towing vessels, when operating under the authority of a higher-grade credential, that mariner has an increased role in ensuring the safe operation of a vessel. That responsibility demands a mariner have recent sea service within a shorter time period to ensure competency in new vessel equipment, safety practices, and vessel operations. The time period should not be changed from three years to seven years because such a change would pose serious safety concerns.

2. Is it necessary to have a requirement for recent sea service for an original, renewal, or raise of grade of an MMC with a national officer endorsement?

Yes. Recent sea service requirements serve as an important standard for ensuring competency in the maritime workforce. Responsible vessel operators do not place inexperienced mariners in command positions where that inexperience would adversely affect safety, but regulatory sea service and recency requirements ensure that all operators in the maritime industry adhere to that practice. While sea service requirements are a barrier to entry for mariners to advance into

careers as officers, it is a necessary barrier intended to ensure the competency of mariners charged with making operational decisions that impact the safety of their crews, the waterways, the marine environment, and the general public.

Thank you again for the opportunity to engage in the Coast Guard's broad consideration of sea service requirements for national officer endorsements. We would be pleased to answer any questions or provide further information as you see fit.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Carpenter". The signature is written in a cursive, flowing style.

Jennifer A. Carpenter
Executive Vice President & COO