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### LOWER-LEVEL MARINERS ARE A MAJORITY OF ALL U.S. MERCHANT MARINERS

#### Background

As early as 1992, the National Association of Maritime Educators (NAME) followed by the Gulf Coast Mariners Association (GCMA) in 1999, asserted that “lower-level” mariners were a majority of all mariners in the U.S. Merchant Marine.

In December 1992, we pointed out that the Coast Guard’s license information system had no capability of ascertaining how many, or what type of valid merchant marine licenses or merchant mariner documents existed at the time.<sup>(1)</sup> However, the Coast Guard made absolutely no commitment to maintain that type of information until late 2004. [<sup>(1)</sup>Source: NAME Newsletter #31, p.7]

#### Coast Guard Awakens to Security Concerns

In the Summer issue of Proceedings of the Marine Safety and Security Council, the Coast Guard reported a total of 204,835 licensed and certificated mariners – the first such summary in over 10 years! Of that total, 126,362 credentials are, prima facie and without question, those of our “lower-level” mariners. We point out that this is a conservative estimate since many other “lower-level” mariners may exist outside that count in other categories enumerated in Proceedings.

During his term as Coast Guard Commandant and before he took over control of the Transportation Security Administration (TSA), GCMA repeatedly asked Admiral James Loy to provide our Association with a count of all mariners under the superintendence of the Coast Guard. We never received the courtesy of a reply.

#### Transportation Workers Identification Credentials Spur Interest in Mariner Identity Issues

In June 2006, we urged Department of Homeland Security (DHS) Secretary Michael Chertoff to ask the same questions and draw the same conclusion that GCMA did many years ago. How can the Coast Guard know who our mariners are if they cannot even count them properly to say nothing of tracking their whereabouts for a call-up in case of a national emergency? While we appreciate the effort of the National Maritime Center to publish a “head count” in 2005

following our specific request to do so, we understand that the Coast Guard never maintained centralized files of licensed mariners until quite recently. This is in spite of the fact that the Coast Guard always had an unbroken maritime security mission since end of World War II. They just never performed that mission competently until the terrorist attacks of September 11, 2001 drove the issue to the forefront. Their lax performance has come back to haunt them.

During the administration of Admiral Robert E. Kramek, the word “security” was removed from the job title of the Assistant Commandant for Marine Safety, Security, and Environmental Protection only to be hurriedly restored by means of hundreds of costly paperwork changes in the Code of Federal Regulations following the events of September 11, 2001. Shuffling this mission to the Transportation Security Administration within the huge Department of Homeland Security only underscores the Coast Guard’s belated attention to their traditional maritime security mission.

#### TWIC Burdens Unfairly Fall on Our Mariners

Since “lower-level” mariners are the majority of all U.S. merchant mariners, the impact of the proposed TWIC rulemaking will fall most heavily and inequitably upon all lower-level mariners. GCMA believes the Coast Guard should carry the burden of straightening out the mess that a number of Commandants of the Coast Guard allowed to exist. The Coast Guard is well paid by the American taxpayer to carry the burden and not to shift that weight of that burden onto the backs of our mariners.

#### Latest Figures Prove Lower-Level Mariners Are a Majority of all U.S. Merchant Mariners

The Proceedings figure of 204,835 mariners may account for all currently credentialed mariners. However, that figure fails to include thousands of other mariners working in uncredentialed positions of deckhand, deckineer, unlicensed engineer, or cook on vessels of less than 1,600 Gross Register Tons or for the alien “riding gangs” allowed on large merchant vessels. Thousands of these individuals do not possess licenses or documents, nor were they ever required to do so. How did these individuals fall below the radar screen” until this TWIC rulemaking suddenly proposed that they purchase a high-tech TWIC credential at exorbitant prices? We will explore that question.

#### USCG Superintendence of the U.S. Merchant Marine

Congress, in 46 U.S. Code §2103, placed general superintendence of the U.S. Merchant Marine (of which our “lower-level” mariners are in an overwhelming majority) under the Secretary of the Department of Homeland Security. We assert that the Coast Guard consistently, over a span of many years, trivialized the importance of the valuable services our “lower-level” mariners performed, and harassed and haggled with them with a longstanding and unbroken record unconscionable inefficiency in most of the nation’s 17 Regional Exam Centers (REC). The user fee, as collected in the REC, became an irritating symbol of bureaucratic inefficiency and mediocrity. It is little wonder that a personnel crisis currently overwhelms many branches of the maritime industry employing our “lower-level” mariners.

#### Coast Guard Overlooks Thousands of Lower-Level Mariners

Even worse, however, is that the Coast Guard never even

raised a finger regulate thousands of “lower-level” mariners who work on commercial vessels. If Congress never gave them the authority to do so, it is because Coast Guard officials, influenced by their close “partnership” with management and industry trade associations chose never to mention this group of mariners to Congress. Specifically, the mariners we refer to are:

- Crewmembers of over 3,000 small passenger vessels up to 100 Gross Register Tons (GRT) carrying less than 149 passengers.<sup>(1)</sup> GCMA previously commented to the TWIC docket that vessels carrying less than 149 passengers make excellent terrorist targets. The Department of Homeland Security needs to realize that the death or injury of this number of passengers on a public conveyance by an act of terrorism would have a public impact comparable to the Murrah Federal Building bombing in Oklahoma City or the Madrid or London commuter train bombings. Yet, many of these “lower level” mariners receive little if any formal **training**. Instead of required training and in lieu of “regulations” requiring it, there are only “guidelines” in the form of unenforceable Navigation and Vessel Inspection Circulars #1-91.<sup>(1)</sup> [<sup>(1)</sup>Refer to GCMA Report #R-429.]
- Every unlicensed crewmember on the entire inland and river towing vessel fleet of approximately 5,200 vessels up to 1,600 Gross Register Tons (GRT) throughout the United States. With the huge turnover within the industry, many of the individuals involved are treated as nothing more than casual labor. Our comments on **training** in the previous paragraph hold true here as well except that we cite existing NVIC 1-95 for towing vessels. Congress never authorized the Coast Guard to limit these mariners to even a 12-hour workday.<sup>(1)</sup> This results from the Coast Guard’s Headquarters’ close “partnership” with vessel owners (who often employ Coast Guard officers after retirement). The Coast Guard overlooks the fact that the towing industry’s much-touted Responsible Carrier Program finds nothing wrong with a 15-hour workday for uncredentialed mariners. It is easy to connect the dots and understand why Coast Guard officials never brought these and other overt abuses to the attention of Congress in a Legislative Change Proposal. We informed the Coast Guard of these problems years ago. [*Refer to GCMA Report # R-370 (Series) 12-Hour Rule Violations; GCMA Reports #R-375, Crew Endurance: The Call Watch Cover-up; and GCMA Report #R-346, Work-Hour Abuse, Whistleblower Protection and “Deadhead Transportation.”*]
- Crewmembers of offshore supply vessels (OSV) on vessels up to 100 GRT.
- Crewmembers on offshore tugboats up to 100 GRT.
- Paid uncredentialed crewmembers of thousands of uninspected passenger vessels (UPV) whose Operators hold licenses and now will be required to obtain TWICs.

The proposed \$139 plus two trips to a new TSA “enrollment center” would strike this unrepresented group of “lower-level” mariners very heavily. It would further discourage others from ever entering an industry that has become increasingly unattractive. While many employers might opt to import cheap foreign labor or even resort to using illegal aliens to continue to show a profit – both activities would be directly counter to the stated purpose of this rulemaking to secure American ports from terrorist attack. Consequently, GCMA strongly opposes these alternatives and favors reasonable internal reforms we have advocated within the marine industry.

### **The Coast Guard Continues to Neglect Our “Lower-Level” Mariners.**

The Coast Guard has become so accustomed to neglecting and ignoring our mariners to the point where they never even bothered to mandate basic shipboard or shoreside training for any of the five groups previously listed. Nor did they require any training or offer career guidance for a significant portion of the 43,339 “entry-level” mariners enumerated in Summer 2005 issue of Proceedings. By “entry-level,” we refer only to those “ordinary seamen,” “wipers”, or “food handlers” who have merchant mariner documents (MMD) and work on vessels from 100 to 1,600 tons. Our count of “lower-level” mariners does NOT include any of this large number of mariners because many work on vessels larger than 1,600 GRT. Our comments do not refer to entry-level positions on vessels greater than 1,600 tons that do receive the distinct advantage of meaningful training at union schools. However, our Association currently is working on this training issue within MERPAC.<sup>(1)</sup> [<sup>(1)</sup>GCMA Project #R-429.]

### **Common Job Titles Omitted From Coast Guard’s Vocabulary**

Unfortunately, common employment terms like “deckhand,” “deckineer,” “cook,” and “unlicensed engineer” do not even exist in the Coast Guard’s regulatory lexicon although thousands of “lower-level” mariners in the five groups listed above currently fill these jobs. Many of these jobs, especially on towing vessels, are extremely dangerous and unforgiving as we record in GCMA Report #R-351, How Safe Is The Towing Industry? This report contains a reprint of a 1994 in-house Coast Guard document that the Coast Guard chose to ignore for years, even after we published it on the internet. Those same “lower-level” jobs experience a massive “turnover” of industry personnel every year that, unless checked, will make it virtually impossible to keep track of thousands of uncredentialed persons serving on commercial vessels under 1,600 gross register tons. We looked in vain for a provision in the proposed TWIC rulemaking that requires a credentialed mariner to notify either the Coast Guard or the TSA of a permanent change of address. We believe that this is a significant regulatory shortcoming, especially in the event of a call-up of qualified mariners in event of a national emergency.

### **Lower-Level Mariners Are Not Casual Labor**

Many employers treat uncredentialed deckhands, deckineers, unlicensed engineers, and cooks as nothing more than casual labor. This now has become more significant because these individuals have access to secure areas on vessels and may have access to waterfront facilities at crew change. Security concerns call for this segment of the workforce to be 1) recognized and then 2) identified as a major priority. The Coast Guard never recognized them in years of writing volumes of regulations except those “entry-level” ordinary seamen, wipers, and food handlers.” However, this “entry-level” classification is only recognized on vessels of over 100 gross register tons.

### **Lower-Level Mariners Need Workplace Safety Protection**

All “lower-level” mariners in the five groups we cited above as well as the “entry-level” mariners the Coast Guard

minimally regulates as an afterthought must have adequate workplace protection by formal federal regulations that Congress must authorize. These regulations must guarantee these workers the safety in the workplace as envisioned by Section 251 of the Occupational Safety and Health Act of 1970. The Coast Guard failed to enact regulations comparable to regulations governing comparable dangerous landside occupations either on the Outer Continental Shelf<sup>(1)</sup> or in at least three other major areas where "protection, when provided," is limited to unenforceable and watered down "guidelines" promulgated in various Navigation and Vessel Inspection Circulars (NVIC).<sup>(2)</sup> [<sup>(1)</sup>46 CFR Part 143. *Industry delayed and the Coast Guard procrastinated over its revisions for years while OCS workers including our mariners were left with insufficient protection.* <sup>(2)</sup>*i.e., hearing protection; protection from asbestos; and the provision of sanitary water for drinking, cooking, and bathing. Refer to GCMA Reports # R-349, Protecting Mariners' Hearing; and #R-395, Safe Potable Water and Food Service On Workboats; An Appeal To Congress.]*

### **FBI Checks & Terrorist Watch Lists**

After security concerns are satisfied, this currently unregulated part of the maritime workforce needs to pass through the same FBI checks and terrorist watch lists as proposed in the TWIC rulemaking – the same steps proposed for all currently credentialed mariners. From a security standpoint (with no slight to the personal integrity of any American intended), our Association believes this (and alien "riding gangs") may be the most uninformed, unstable, and questionable part of the current maritime workforce. Part of this is a result of the fact that the Coast Guard in its superintendence of the U.S. merchant marine failed to get its message across to the credentialed and uncredentialed mariners alike.<sup>(1)</sup>

Those mariners who pass the full security checks should be employable. However, they must receive adequate training, have an opportunity for steady employment or retraining, and be able to gain seniority within the marine industry. The forthcoming inspection of towing vessels mandated by Congress in 2004 may bring discipline and order through the imposition of meaningful regulations to an industry that has thumbed its nose at both regulation and its mariners for years. In summary, the large uncredentialed portion of the workforce needs to be identified and stabilized with immediate, adequate, and recorded safety and vocational training.<sup>(2)</sup> [<sup>(1)</sup>*Refer to GCMA Report #R- R-382, Why Our Mariners Don't Get The Message.* <sup>(2)</sup>*Refer to GCMA Report #R-429]*

### **Lest We Forget**

#### **A little institutional "History"**

It doesn't take an astute navigator to understand that if you don't know where you are or where you have been that it will be hard to know where you are going.

After following the Coast Guard's Merchant Vessel Personnel fumbling bureaucracy for over twenty years, the National Association of Maritime Educators<sup>(1)</sup> decided to ask them "where they were" in December 1992 because they were genuinely concerned with where they were going and how they plan to get there. [<sup>(1)</sup> *National Association of Maritime Educators (NAME), Newsletter #31, Dec. 1992.*]

As a measure of the Coast Guard's licensing program, NAME asked a simple question in the summer of 1992:

"How many individuals currently hold Coast Guard licenses and documents?" Headquarters didn't have a clue and told NAME under the Freedom of Information Act that an "estimate" would cost at least \$2,500! Specifically, in regard to NAME's Freedom of Information Act (FOIA) request of July 30, 1992 CDR Scott I. Glover (G-MVP-2) replied as follows on September 18, 1992:

"I am writing in reply to your Freedom of Information Act request of July 30, 1992. The information you requested concerning the total number of individuals that hold current licenses, certificates of registry or merchant mariner's documents is not maintained in the format you have requested. Our License Information System and Merchant Marine Documentation System track license and document issues, upgrades, endorsements and renewals. These systems allow us to quickly determine whether a specific individual was issued a license, Certificate of Registry (COR) or document and which Regional Exam Center holds the individual's records. As you noted in your request, this information is published annually in the Proceedings. We do not, as a normal course of business, maintain statistics on the number or licenses, Certificates of Registry (COR) and merchant mariner's documents which are active or valid."

"The Coast Guard has been issuing Merchant Mariner's Documents since 1937 and maintains approximately 1.4 million seaman's records. However, as the documents have no expiration date<sup>(1)</sup> we have no way of knowing which document holders are actively sailing or even which document holders are even still alive." [<sup>(1)</sup>*Starting in 1994, MMDs now expire every 5 years! 59 FR 49301, Sept. 27, 1994.*]

"A computer search of the License Information System (LIS) could be conducted to develop an estimate of the number or valid licenses. The estimate would be developed by adding the number of licenses renewed in the last five years with the number of licenses issued in the same period. The lists would be cross-checked to eliminate double counting (i.e., individuals completing more than one license transaction during the period). Unfortunately this progress will be very time consuming and must be billed at the rate of approximately \$100 per hour. To estimate the number of valid licenses by category as listed in the Proceedings would require at least 25 chargeable hours to complete."

"You indicate that you were particularly interested in the 'total number of upper level and lower licenses.' Such a narrowing of the focus would greatly reduce the work required and thus the cost to you. Please contact me directly to clarify how you wish me to proceed. If I have not heard from you by October 1, 1992, I will assume you no longer request this information."

In 1992, NAME reviewed the last six annual reports of license statistics that used to be printed each year in the Coast Guard's publication Proceedings of the Marine Safety Council so we could add all the successful renewals for each grade of license and arrive at a fairly accurate number of active licenses. After all, if a license is not successfully renewed in 5 years plus the one-year grace period, the license has definitely "expired." In retrospect, it was much simpler to arrive at an estimate in 1992 than it is was in 2004 because the license statistics were no longer published annually in Proceedings and many licenses are now routinely "renewed for continuity" and are, for all intents and purposes, inactive.

NAME noted in passing that the Coast Guard holds instructors who present "approved" courses to a much higher

standard of record keeping than they appear to expect of their own employees at Headquarters. We were surprised that even though the Coast Guard had a computerized license information system, they never thought to ask it to keep track of the total number of licenses and merchant mariner documents and the upgrades they issue. Accurate record keeping is a basic requirement of private and public schools in most states. Many maritime schools started using computer programs in the 1970s to keep track of the name, address, and social security number of each student, the dates of school attended, the courses completed, the grades attained, the dates tested, the dates licensed, the license held, date of license renewal, and license upgrades subsequently received. In fact, most businesses maintain comparable business records.

NAME realized that the supervision of computer programs at the new National Maritime Center was so dismal that they reported it to the Inspector General's Office.

### Problems at the National Maritime Center

The National Maritime Center is the successor to most of the functions of the old Merchant Vessel Personnel Division (G-MVP). The story of what happened to the Coast Guard's computers that managed merchant mariner personnel records was detailed in NAME Newsletter #83, August 1999 in an article titled Finally Answered: How Bureaucracy Wrecked the USCG Marine Licensing and Documentation Computer System. The article detailed hopelessly inept management from beginning to end.

NAME also expressed its concerns to U.S. Representative "Billy" Tauzin, then Chairman of the Subcommittee on Coast Guard and Navigation, in a letter dated September 23, 1992 which stated in part:

"... It is hard to believe that current, up-to-date statistics concerning the active personnel in the merchant marine service are simply not available from their sophisticated computer system."

"Although OPA-90 calls for 5-year renewable Z-cards, I am not convinced that the Coast Guard has any plans to keep any better track of the total number of cardholders than they apparently have kept of licenses which are renewed every 5 years "

"President (George H.W.) Bush's 90-day Regulatory Review uncovered the fact that the Coast Guard spends several million dollars each year maintaining sea service records for merchant mariners. They apparently hire a contractor to do much of this useless work. In their letter of September 18<sup>th</sup> is mention of the fact that 1.4 million seamen's records have been maintained since the Coast Guard began issuing merchant mariners' documents in 1937. It seems that this, too, represents an ongoing waste of money. It is really amazing that all these records are gathering dust yet cannot furnish what should be the most basic statistical information about the entire program: its size."

"It appears that something ought to be done. I won't burden you with my suggestions. But, if you agree, just send a puff of white smoke from Washington."

### Representative Tauzin's Reply

Representative Tauzin's reply of November 30, 1992 stated in part: "I share your concern that the Coast Guard may not be maintaining its statistical information in the most

accessible and cost-effective manner possible. The Coast Guard is developing a Notice of Proposed Rulemaking that will require Merchant Mariner Documents to be renewed on a 5-year cycle similar to licenses. I will monitor the Coast Guard's progress in this area and encourage the development of a more functional and less expensive information system." There is no indication that he ever did so.

Since the Coast Guard could not provide the total number of licensed and documented mariners, NAME Director Walt Martin (USCG, Ret'd) worked with the figures published in the Proceedings. However, these figures only detailed license transactions and not merchant mariners' documents (Z-cards). Although the Regional Exam Centers provided monthly reports of their licensing activity to Washington, Headquarters either seemed to have a problem compiling the information or in releasing it to the public in a consistent and timely manner. Consequently, NAME's "latest figures" were based on the year 1990 and were compiled by NAME Director Walt Martin.

### Findings of Fact

Total Upper Level Deck licenses, Deck: 14,346 .....(8.65%)  
 Total Upper Level Engineer Licenses: 23,618 .....(14.24%)  
**Total Lower Level Deck Licenses: 115,302 ..... (69.5%)**  
**Total Lower-Level Engineer Licenses: 4,552 ..... (2.74%)**  
 Total Other Deck Licenses<sup>(1)</sup> : 1,125 .....(0.68%)  
 Total Other Engineer Licenses<sup>(1)</sup> :221 .....(0.13%)  
 Total First Class Pilot (Deck) Licenses: 6,686 .....(4.03%)  
 Total Active Licenses (estimated): 165,850 .....(100%)  
 [<sup>(1)</sup> Other included MODU licenses]

Walt Martin also pointed out...

- At that time (1992) the Coast Guard License Information System had no capability of ascertaining how many, or what type of valid Merchant Marine licenses or Z-cards were in existence at any given time. They made no commitment to upgrade their system to maintain the type of information we requested.
- Based on the total number of transactions for 17 Regional Examination Centers, the average workload at each center was approximately 8.26 license transactions per working day over the preceding 6 year period.
- That, in the year 1985, the average workload at each Regional Examination Center was approximately 9.91 license transactions per working day.
- That, in the year 1990, the average workload at each Regional Examination Center had dwindled to only 6.19 license transactions per day.
- That, given the above figures, the average license-transaction workload at the Regional Examination Centers had fallen by over 37% between 1985 and 1990.
- That, in 1985 the Coast Guard Marine Safety budget totaled approximately \$125,800,000, and by 1990 had increased by over 57% to \$218,900,000 according to a Commandant Bulletin.

### Fast-Forward To 2003

In 2001, before the 9/11 terrorist attack on New York and Arlington, VA, the Gulf Coast Mariners Association (GCMA) made several attempts under FOIA to obtain a count of licensed and documented mariners. After the National Maritime Center simply ignored our requests, we wrote directly to the personal attention of then-Commandant James Loy who also ignored us.

### **So What! Is Any of This “Important”?**

If over 70% of all licensed mariners serve on vessels of less than 1,600 gross tons, this represents a clear majority of all mariners. When NAME pointed this out in 1992, they believed that “lower-level” mariners deserved significantly more attention from the Coast Guard than they received from them in the past. By “consideration” they meant that lower-level mariners deserved more attention from the Coast Guard as a licensing authority. These words fell on deaf ears between 1992 and 1995 when the Coast Guard worked with the IMO to revamp the moribund STCW Convention of 1978 with hardly a mention of this vast undertaking reported to “lower-level” mariners. The 1995 STCW “amendments” and specifically the totally new STCW Code would have a severe impact upon many lower-level mariners. Nevertheless, the Coast Guard sailed their handiwork right past the United States Senate bypassing normal Senate ratification of treaty procedures by a smooth public relations campaign. Consequently, on July 5, 1995, lower-level mariners faced 260 pages of new and confusing international requirements.

Lower-level mariners in the Eighth Coast Guard District mariners really never found out about STCW-95 until GCMA brought it to their attention by sponsoring a public meeting in Larose, LA, attended by over 300 people.

The STCW-95 “amendments” required many mariners to obtain basic STCW training in the years between 1999 and 2002. GCMA succeeded in obtaining federal funding and, with help from the U.S. Department of Labor and four maritime labor unions, established a separate entity, the GCMA Education Fund. Separately, and often at cross purposes, a number of boat companies tapped the state of Louisiana for training funds to train their own employees at public expense while falsely trying to persuade their mariners that receiving training under the GCMA government grant would somehow tie them into a labor union.

Throughout the implementation of STCW-95, a major ordeal for many lower-level mariners, the Coast Guard never raised a finger to see if any training funds were available to finance this grandiose scheme. Much of the documentation they provided was and still is in unintelligible bureaucratic jargon that flies over the head of most lower-level mariners.

Since the Coast Guard has proven to our satisfaction that they don’t have a clue as to how many active “lower-level” mariners there are in the workforce, we wonder how they can ever contact them if the need arises, like in a national emergency.

We are amused when we see that the Coast Guard still uses “hot lists” in their Regional Exam Centers. This trusts that some alert minimum-wage clerk will check the list during an interview or while checking mail-in paperwork. Each mariner must contact the REC for license or MMD renewals once in every 5 years or when (or if) the mariner chooses to upgrade. Those who have no such credentials remain “unknown” to the Coast Guard. This is a very crude process for the 21<sup>st</sup> century and seems to be out of touch with the needs of homeland security!

### **The effects of 9/11**

The Coast Guard had to “get its act together” following the terrorist attacks of September 11, 2001 – and took some giant steps in that direction. For the first time, they slowly began to grasp the significance of knowing how many merchant mariners they currently regulate.

### **GCMA Pushes for Answers**

In a letter to an official at the National Maritime Center on March 31, 2005, the GCMA Secretary made these points:

“The entire licensing mess at the RECs has hurt lower-level mariners as well with unrealistic expectations from Coast Guard civilian and military personnel at NMC who know next to nothing about our mariners and the challenges they face because they, for the most part, never served on small commercial vessels. A significant part of our mariner workforce simply dissolved and found work elsewhere. We see it happening on a daily basis but have no license/MMD statistics to prove it. This is why the allegations made by Jim Daley of Crowley at the last TSAC meeting that no 1,600-ton masters were created in New Orleans over a one-year period appear to be so significant – if they are, in fact, true.

“I see one great potential shortcoming in the statistics you may or may not be able to generate. Aside from the lower-level OUPV licenses, none of the M&O and towing vessel deck and engine crews (either offshore or inland) serving on vessels under 100 GRT is even required to carry an entry-level Z-Card. This means that the Coast Guard has absolutely no control of or knowledge of who these people are and the training they have received (or probably never received).

“During the mid-1990s, the Seafarers International Union pointed this out and tried to have the Coast Guard issue z-cards for all maritime transport workers. They were not successful because the towing companies turned it into a political issue and an (anti-) union issue. This was unfortunate because the extra burden of maintaining these records (place) on the Coast Guard appears to completely justified following the events of 9/11. Without basic security information and background checks, all sorts of drug users, illegal immigrants, persons who have lost their licenses and MMDs, foreign nationals, and persons with criminal backgrounds are free to serve in the marine industry. They have nothing to lose.

“I am glad we had an opportunity to speak (on the telephone). As the resident expert and only person I know of that understands and can discuss (this issue) authoritatively (as well as) the previous computer screw-ups at the NMC, I hope that you can put together a system that records the type of license and MMD statistics the Coast Guard really needs to maintain. However, I encourage you to seek broad input in setting up your system that you will carry forward from this point and publish annually in Proceedings magazine. Remember, I am only a “user” of the system and our agenda only includes lower-level licenses.”

### **Huge Security Gaps**

Absolutely nobody mentions all the unlicensed deckhands, non-navigating mates, unlicensed wheelmen and engineers that serve on 5,200 towing vessels, over 3,000 small passenger vessels under 100 tons, and on every offshore vessel under 100 gross tons. The Coast Guard has no official record of them either...no count, no names, no addresses, no criminal background information...nothing!

Over the years, our mariners have been too easy to ignore and too much trouble to even count...a limitless source of warm bodies. Now, in the war against terrorism this is where we stand. What the Coast Guard has ignored and botched over the years could come back and haunt them and harm the United States. What is even worse is the Coast Guard’s propensity and ability to hide their shortcomings from Congress and the American people.

### It's About Time

By the summer of 2005, the National Maritime Center published a new set of licensing statistics they can stand by.

#### Mariner Credentials as of December 31, 2004

"After a 10-year hiatus, *Proceedings* is again publishing statistics on the make-up of the U.S. merchant marine. It is our plan to make this a regular feature of the summer issue.

"Technology improvements have enabled us to improve the utility of the published statistics. Previous statistics were based on hand-compiled tallies of annual licensing transactions. While the data provided a general idea of licensing activity and program workload, the figures could not be used reliably to provide a breakdown of the u.s. merchant marine population and its qualifications.

"The numbers provided with this article represent mariners with the qualification indicated as of December 31, 2004. The U.S. licensing and mariner documentation program is a complex one that meets a broad spectrum of industry needs. There are literally hundreds of different permutations and combinations of licenses and ratings issued to U.S. mariners. It is not possible in the space available to list all of these alternatives. We have patterned the listed categories after previous reports, and it is our hope that these provide sufficiently informative detail. Where qualifications are in transition (for example, the transition from Operator Uninspected Towing Vessel to Master Towing) and there are mariners holding both qualifications, they have been combined.

Many mariners hold more than one qualification. The numbers presented here endeavor to capture all of those qualifications. For example, a mariner holding a license as a 1600-ton Master and an unlimited second mate would be counted in each category. Similarly, a Chief Engineer, Steam and Motor, is counted in each propulsion category.

We hope this breakdown is useful to *Proceedings'* readers. We welcome your suggestions for improvements.

#### U.S. Merchant Marine: Summary Statistics

	TOTAL NUMBER WITH STCW	
Mariners with an MMD only	66,870	16,322
Mariners with license only	95,789	4,166
Mariners with both a license and an MMD	42,176	28,674
TOTAL	204,835	49,162

#### U.S. Merchant Marine: MMD-Holder Statistics

	TOTAL NUMBER
Mariners with or more qualified Deck Dept. ratings	36,618
Mariners with more qualified Engine Dept ratings	16,921
Mariners with any tankerman rating	18,214
Mariners with only enter-level ratings	43,339
Mariners with only entry-level ratings + lifeboatman	2,598

### Licensed Deck Department

Description	Number of Mariners
Master Ocean Any	3,411
Master Near Coastal Any	93
Chief Mate Ocean Any	875
Chief Mate Near Coastal Any	3
Second Mate Ocean Any	1,417
Second Mate Near Coastal Any	8
Third Mate Ocean Any	3,475
Third Mate Near Coastal Any	102
Master Ocean Not More Than 1,600 Tons	5,089
Master Near Coastal Not More than 1,600 Tons	2,742
Mate Ocean Not More Than 1,600 Tons	286
Mate Near Coastal Not More Than 1600 Tons	985
Master Ocean Not More Than 500 Tons	579
Master Near Coastal Not More Than 500 Tons	1,269
Mate Ocean Not More than 500 Tons	78
Mate Near Coastal Not More Than 500 Tons	181
Master Ocean Not More Than 200 Tons	180
Master Near Coastal More Than 200 Tons	2,184
Mate Near Coastal Not More Than 200 Tons	972
Master Near Coastal Not More Than 100 Tons	26,627
Master Uninspected Fishing Industry Vessel	804
Mate Uninspected Fishing Industry Vessel	204
Master (OSV)	130
Chief Mate (OSV)	1
Mate (OSV)	19
Master Great Lakes In. Any	305
Mate Great Lakes In. Any	222
Master Great Lakes and In. More than 1600 Tons	155
Mate Great Lakes In. Not More than 1600 Tons	53
Master Great Lakes In. Not More than 200 Tons	30
Mate Great Lakes In. Not More than 200 Tons	12
Master Inland Any	1,049
Mate Inland Any	241
Master Inland Not More Than 200 Tons	438
Mate Inland Not More Than 200 Tons	353
Master Inland Not More Than 100 Tons	7,451
Mate Inland Not More Than 100 Tons	40
First Class Pilot	3,451
OUTV/Master Towing	13,336
2 <sup>ND</sup> -Class OUTV/Mate (Pilot)	185
Apprentice Mate (Steersman)	84
Operator Uninspected Towing Vessel	30,518
Assistant Towing Endorsement	21,332
Offshore Installation Manager	1,784
Barge Supervisor	632
Ballast Control Operator	351

**Licensed Engine Department**

Description	Number of Mariners
Chief Engineer Motor	3,175
1 <sup>st</sup> Asst. Eng. Motor	1,062
2 <sup>nd</sup> Asst. Eng. Motor	1,151
3 <sup>rd</sup> Asst. Eng. Motor	3,940
Chief Engineer Steam	2,204
1 <sup>st</sup> Asst. Eng. Steam	985
2 <sup>nd</sup> Asst. Eng. Steam	1,108
3 <sup>rd</sup> Asst. Eng. Steam	3,974
Chief Eng; Turbine	2,256
1 <sup>st</sup> Asst. Eng. Turbine	876
2 <sup>nd</sup> Asst. Eng. Turbine	934
3 <sup>rd</sup> Asst. Eng. Turbine	2,105
Chief Engineer (Limited-Ocean)	1,466
Assistant Engineer (Limited-Ocean)	448
Chief Engineer (Limited-Near Coastal)	438
Designated Duty Eng.	2,379
Chief Eng; Uninspected Fish. Ind. Vsl.	589
Assistant Engineer Fish. Ind.	114
Chief Engineer MODU	114
Assistant Engineer MODU	0
Chief Engineer (OSV)	534
Engineer (OSV)	7

**Licensed Radio Officer and Certificates of Registry**

Description	Number of Mariners
Radio Officer	335
Chief Purser	189
Purser	65
Sr. Asst. Purser	26
Jr. Asst. Purser	138
Medical Doctor	86
Professional Nurse	85
Surgeon	3

**Merchant Mariner Document Ratings**

Rating	Number of Mariners
<b>Able Seaman</b>	
AB-Special	3,649
AB-Limited	3,491
AB-Unlimited	11,870
AB-Special (OSV)	3,241
AB-MOU	2,463
AB-Fishing	173
AB-Sail	299
<b>Qualified Member of the Engine Department</b>	
QMED-Deck Engine Mechanic	179
QMED-Deck Engineer	924
QMED-Electrician	1,199
QMED-Engineman	191
QMED-Junior Engineer	1,505
QMED-Machinist	755
QMED-Oiler	4,583
QMED-Pumpman	1,303
QMED-Refrigerating Engineer	853
QMED-Fireman/Watertender	2,382
QMED-Any Rating	865
<b>Lifeboatman</b>	
Lifeboatman	19,810
<b>Tankerman</b>	
Tankerman-Pic	4,291
Tankerman-Pic (Barge)	871
Tankerman-Eng.	901
Tankerman-Asst.	4,464
<b>Licensed Officer Ratings</b>	
Any Unlic Rating in Deck Dept. Except AB	995
Any Unlic Rating in Deck Dept. Include AB	12,214
Any Unlic Rating in Engine Dept.	11,137
<b>Cadet/Deck or Engine</b>	
	3,587
<b>Entry Level Mariners</b>	
	43,339