



NMA REPORT #R-401-L

DATE: July 7, 2011

124 North Van Avenue  
Houma, LA 70363-5895  
Phone: (985) 851-2134  
Fax: (985) 879-3911  
[www.nationalmariners.org](http://www.nationalmariners.org)  
[info@nationalmariners.org](mailto:info@nationalmariners.org)

Asserting our right "...to petition the Government for redress of grievances."

Amendment 1, U.S. Constitution, Dec. 15, 1791

## PROBLEMS IN COAST GUARD LICENSING 1986 – 1999

### Documents of Possible Historical Interest

The NMA Report #R-401 series contains documents of possible historical interest to "limited tonnage" mariners who seek to develop a better understanding of where they stand today in light of certain events in the past..

### The National Association of Maritime Educators (1986-1999)

The National Association of Maritime Educators (NAME) was founded in 1986 by Walt Martin (LCDR, USCG Retired) who founded Martin International that continues today in training personnel in the offshore mineral and oil industry. NAME published a series of 99 Newsletters (N/L) between 1987 and 1999 that were distributed to a mailing list of as many as 500 instructors and merchant mariners.

During these years, "licensing" and documentation underwent a number of changes that were reflected in various Newsletter (N/L) articles. The major changes during these years included:

- Release of the Coast Guard examination Question and Answer (Q&A) database and its publication by the Government Printing Office as a result of a Freedom of Information Act request and formal appeal by Marine Education Textbooks to the Commandant.
- The United States Senate adopted the amended Standards of Training, Certification, and Watchkeeping Convention in July 1995 – in which the Coast Guard allowed "limited tonnage" mariners no input whatsoever. While our Association understands that mariners on true "international" voyages to foreign countries need to comply with international STCW standards, few provisions were made for our "limited-tonnage" mariners in domestic, coastwise trade. We believe that certain portions of the Convention need to be "renounced."
- The principal maritime labor unions used the period between 1995 and 1999 to prepare their members for STCW. STCW would apply to coastwise and international trade.
- The National Maritime Center was founded in 1995 and many personnel moved from Oklahoma City to leased office space in Arlington, Virginia. The location was separate and distinct from Coast Guard Headquarters across the river in Washington. The Coast Guard, whose "educational" mission to this point was limited to "testing" merchant marine personnel, now became concerned with "training" merchant mariners to international standards. From Day 1 the Coast Guard immediately became the "experts" in their new endeavors.
- The National Maritime Center's computer and organizational skills were found to be sadly lacking (see NMA Report #R-401-B) and several scandals in licensing erupted.
- Four major national maritime unions (AMO, MEBA, MM&P, SIU) that operated well-established training schools offered their expertise in training merchant mariners through the Gulf Coast Mariners Association (GCMA). The offshore oil industry was unwilling to recognize the training offered by GCMA and cut its own deal with the Coast Guard for OSV licenses.
- It was at this point (following the death of Walt Martin) where NAME Newsletters that focused on "limited tonnage" (i.e., "lower-level) mariner education and training came to an end and GCMA Newsletters with much broader coverage of "limited tonnage" mariner issues began.
- In the interim (1999-2001), the towing vessel-licensing project occurred and was covered by both NAME and GCMA Newsletters.

### The NAME Agenda

While NAME dealt exclusively with the Coast Guard, GCMA brought its message to Congress. The NAME Agenda that follows summarizes that organization's dealings with the Coast Guard during the years 1986-1999.

# N.A.M.E. NATIONAL ASSOCIATION OF MARITIME EDUCATORS

WALT MARTIN  
EXECUTIVE DIRECTOR

RICHARD A. BLOCK  
NEWSLETTER EDITOR

## AGENDA

*Our Association wishes to direct your attention to problems we have encountered in the area of merchant marine personnel, training and licensing.*

### THE N.A.M.E. AGENDA

Since December 1987 we have attempted through the N.A.M.E. Newsletter to keep maritime educators informed on many different topics in the field of maritime education and training.

Although the Coast Guard maintains that they are not in the business of education and training (except for their own personnel), their role in licensing merchant marine personnel has cast a dark shadow over the maritime training scene for many years. Unfortunately, their presence has provided little in the way of leadership and true public service in this area. We can cite many examples where narrow and inflexible demands of the Coast Guard's licensing program have worked to the detriment of merchant mariners. Many talented instructors do not have the opportunity to teach what mariners really need to know but, rather, the specific facts they need to pass a Coast Guard license or MMD upgrade exam. Money that mariners or their employers could have spent on meaningful education and training close to home have had to be spent on travel and lodging in a distant cities for the sole purpose of passing an exam.

We have observed the Coast Guard at work and have asked them a number of questions about various phases of their activities. We have published their written replies and have drawn our own conclusions. We have collected our conclusions in a proposed "Agenda" for you to read, consider and comment upon. This is just part of keeping you informed on where we stand after a number of years of hard work. We welcome your written comments and criticism.

Except for some conclusions we have reached, there is little "new" information in the pages that follow. Most numbered items cite previous Newsletter (NL) articles by number and page. If you want a back issue of a specific Newsletter to refresh your memory on a particular matter, please send a self-addressed, stamped (\$0.52) business envelope to the Newsletter editor and specify the NL date or issue number.

- 1. THE COAST GUARD HAS FAILED TO COMMUNICATE WITH MARITIME EDUCATORS.** It appears to be the Coast Guard's practice at Headquarters level to ignore and bypass maritime educators as a group. The following are examples: Maritime educators are rarely asked to participate in meaningful test evaluations.
  - When the Coast Guard distributed exam database questions to "87 individuals and organizations that had been identified as having a potential interest in the material" (at a cost of \$5000), they never checked to see whether these persons or organizations had mainframe computers that could use the magnetic tape. Most did not! Consequently, this money and effort was wasted. [*Refer to NL#1, pgs. 2, 7; NL#8 p. 7, 8; NL#8 pgs. 11, 13.1*]
  - Maritime educators were appalled to read in Proceedings that the Coast Guard plans to take a close look at the licensing system over the next 18 months "with emphasis on items selected solely by MVP personnel". [*Refer to NL#20, p. 2, item 2 & NL#20, p. 12.*]
  - Maritime educators are concerned that the Coast Guard is planning to replace the popular 6-pack license with a 12-pack license. The 6-pack license accounts for much of the business of many independent maritime instructors and schools. Maritime educators have had no voice in matter which seems to be caught in a closed circuit between Congress and the Coast Guard. [*Refer to NL#27, pgs. 15, 16; NL#28, p. 3; NL#31, p. 5.*]
  - At the 1992 Industry Day meeting in New Orleans, we presented the Commandant with a list of problems, which need to be solved. We have heard absolutely nothing about solving these problems since the meeting!
  - During the past five years, the Coast Guard curtailed the use of "Clarification Letters" which, under a previous administration, did a commendable job of keeping both the RECs and maritime instructors informed of items of current, mutual interest and importance. Although "Clarification Letter #19" did appear in late 1992, it was confined to treatment of events that had taken place over a year earlier. Furthermore, this "Clarification Letter" was not freely distributed to persons who believed they were on the Coast Guard's "mailing list" for these letters and had to be obtained by a Freedom of Information Act request. Restricting information on licensing shows a profound lack of leadership and organization within the Merchant Vessel Personnel Division and a total disregard for legitimate interests and concerns of merchant marine personnel. [*Refer to NL#3 p. 6; NL#29, p. 4.*]
  - The Coast Guard declined to participate in an electronic bulletin board we sponsored at no cost to the government. The Bulletin Board would have allowed maritime instructors to help the Coast Guard correct errors in its database more rapidly. Nevertheless, we have offered hundreds of corrections in writing in an effort to improve the quality and timeliness of the database. [*Refer to NL#14 p. 11; NL#17 p. 11.1*]

Coast Guard officials do not seem to realize that any licensing system they propose is meaningless and without merit without the training offered by maritime educators.

2. **THE COAST GUARD DOES NOT OFFER SUFFICIENT GUIDANCE TO THE PUBLIC.** The Coast Guard gives maritime educators insufficient guidance to properly prepare candidates to sit for license and MMD exams. Candidates who choose to prepare by home-study have been thrown to the wolves. [Refer to NL#1, pgs. 1, 3, 6 and 12.1]

The Coast Guard provides no explanation, direction or further guidance to license or MMD candidates on individual license subjects other than the brief description that appears in tabular form at 46 CFR Tables 10.910-2, 10.920-2, 12-15.3 and several sketchy lists written into the regulations. Although they may provide additional details in response to specific, direct questions, the Coast Guard has made no sustained effort to disseminate this information to maritime educators or the general public. [Refer to NL#1 p. 2; NL#9 p. 11.1]

In addition, many license applicants are confused when the regulations at 46 CFR Part 10 refer to "subjects" or "topics" while the personnel at the RECs describe licenses in terms of "modules". Although there are significant differences, there is no simple way to compare a "topic" in the regulations to a "module" given in the exam room. [Refer to NL#12 p. 3.1]

The information booklet promised by Captain F.J. Grady in a letter dated December 4, 1991 in response to our letter to the Commandant has never materialized. This information booklet was to serve as a guide to applying and testing for OUPV and 100 ton Master and Mate licenses. These licenses are the two most widely issued licenses according to Coast Guard statistics. [NL#31]

Most MMD candidates have trouble finding suitable training material specifically geared to Oiler and other QMED ratings. Consequently, when the Coast Guard prepares these exams, they should take into consideration the availability of suitable training literature. [Refer to NL#9 pgs. 4, 5.]

The Coast Guard intentionally placed the 18,000 questions in their exam database into large, mixed groupings to discourage students or instructors from sorting questions by license. In doing so, they failed to consider that organization of instructional material is one of the first goals of any good instructor. This needless scrambling of materials has made it much more difficult to ascertain exactly what a candidate must study for any given license exam and has retarded the training process by a number of years. This harassment of maritime educators continues.

For example, in the absence of other guidance, many license candidates bought at considerable personal expense copies of the Coast Guard's Question and Answer "Yellow Books". Within months of making their database questions public under the Freedom of Information Act, the Coast Guard arbitrarily changed many of the question numbers and confused not only students but maritime educators as well. The numbers game still continues five years after the release of the database under the Freedom of Information Act when the Engineering section changed thousands of its question numbers and illustration numbers without a word of warning to maritime educators or to the general public. This action was a source of confusion to all unlicensed members of the engine department seeking MMD upgrades, to all persons seeking engineer licenses, and to maritime educators including textbook publishers. [Refer to NL#30, p. 3.]

In addition, we find the titles of the Coast Guard's Question and Answer "Yellow Books" misleading. We have discovered that certain "Yellow Books" do not necessarily contain all of the questions a license candidate may find in an exam module with the same title - and contains no warning of this shortcoming. This misleads a candidate, who must test or re-test on one module and who buys a Coast Guard "Yellow Book" assuming it contains the information shown on the cover. [Refer to NL#28, pgs. 2, 3.]

The Coast Guard continues to withhold the "module structure files" which contain information that educators consider critical to preparing candidates for Coast Guard license exams and continues to deny our appeal of this action. [Refer to NL#12 p. 2.; NL#15 p. 18.]

3. **IMPROVE THE QUALITY OF MERCHANT MARINE EXAMINATIONS.** The Coast Guard does not appear to consider that, to be of any value to the maritime industry, their exams must be the end product of the educational process. Maritime educators are the key to that process.

The Coast Guard has never kept any records of and, consequently has no idea of the average education level of the marine industry personnel it is testing. It appears to be indifferent, at best, to the many of the educational deficiencies faced by mariners. Coast Guard officials were shocked at the information presented in the "Newman Report\*" in 1973 regarding the educational background of marine industry personnel serving in the offshore oil industry and prefer to ignore it. [\*The report was prepared by Capt. C. T. Newman, USCG. Refer to NL#3 p. 2; NL#4p. 3.]

Current exams do not make adequate compensation for people with limited reading ability. These individuals have trouble reading and answering questions based on the Code of Federal Regulations and tricky questions based on the Rules of the Road. [Refer to NL#3 pgs. 2, 7.1]

We believe that each question, answer, and reference in the Coast Guard's exam database should be perfect before it is presented to the public in the Coast Guard's Question and Answer "Yellow Books" and certainly before it goes to the Regional Exam Centers (REC) as part of a license or MMD upgrade exam module.

We firmly believe that maritime educators should be allowed to review and comment upon all new questions after they are developed and before they appear on any new examination. This is because the current system has proven to be incapable of catching many obvious errors.

We totally disagree with the current Coast Guard policy of springing new and revised questions on the general public without warning and without adequate opportunity to prepare for them. [Refer to NL#2, p. 2; NL#3 p. 2; NL#4 p. 1; NL#11 p.

2; NL#14, p. 7.; NL#14 p. 13; NL#24, p. 20.]

We believe the "Comment and Protest" forms used at Regional Exam Centers are unacceptable. Although these forms may be a good way to shift responsibility and cool hot tempers, they are a poor way to identify and remove bad exam questions from the database -questions, which never should have reached this stage in the first place! [Refer to NL#1, p. 2; NL#2 p. 1; NL#8 p. 8; NL#3, p. 13, item #10.]

We do not believe that unlimited Masters, Chief Mates and Chief Engineers that prepare lower level license exams at Coast Guard Headquarters are sufficiently close to operations and personnel in that segment of the industry to be allowed to select and organize test questions into a meaningful exam without first obtaining the guidance of maritime instructors with experience in training individuals for lower level licenses. [Refer to NL#28, p. 1]

Even when we present written inquiries about database questions, we do not always receive complete and definitive answers. One group of comments on "Tankerman" questions has remained unanswered for well over a year. When we do receive an answer to a specific question, the answer often does not cite which specific change will be made to the question. Instructors often must wait for one or two years before they see the corrected version of the question in the "Yellow Books". [Refer to NL#25, p. 4, item 15 and our letters dated Aug. 17 & 21, 1991.]

In inquiries about suspected inaccuracies in exam questions, we were amazed to find how few mistakes were acknowledged to appear in current test modules. We believe that the Coast Guard's computer software should be upgraded so that an erroneous test question can be immediately located and expunged from any existing test module. [Refer to NL#19, p. 12.]

The Coast Guard seldom informs maritime educators when they plan to introduce questions about new regulatory changes into new exams. We find this to be both inconsiderate and unprofessional. There is no need for this type of secrecy which can only lead to a candidate failing an exam module. This, in turn, leads to frustration, loss of time and money both to the instructor and license candidate. The situation might improve if the Coast Guard would tell maritime educators what subject area projects they are working on and what their schedule for completion is. This would at least allow maritime educators to plan and prepare our instruction to meet the changing needs of our students.

In reviewing databank exam questions, we have discovered that many questions on government regulations are out of date. In a number of instances, Coast Guard "item writers" have not kept the regulations current with changes in the Federal Register or Code of Federal Regulations. The problem may lie with a poor system of references that prevents them from reviewing questions in a timely manner or that their computer software lacks the capability of keeping databank questions up-to-date. Whatever the cause, we believe it results in substandard monitoring of the exam databank and failure to correct, remove and replace bad test questions in a timely manner.

Individual test questions often do not represent situations or conditions encountered by a person sitting for that license. This reflects unfavorably upon the ability, competence and background not only of the person writing the exam but also upon the reviewing authority at Headquarters. [Refer to NL#9 p. 12.]

Duplication and overlapping of exam requirements between many lower level licenses and merchant mariner documents should be examined and terminated wherever possible. [Refer to NL#1, p. 11.]

The radar training program may have a serious flaw in regard to training for lower level licenses. [Refer to NL#16 p. 23.]

**4. COAST GUARD EXAM ADMINISTRATION POLICY LACKS CLEAR WRITTEN GUIDANCE.** The Guide for the Administration of Merchant Marine Deck Examinations (Deck Guide), COMDTPUB P16721.35, August 1990, furnished us under a FOIA request, was reported by REC personnel to be "... full of errors". This was verified later by REC personnel.

The errors are particularly noteworthy because this "guide" was prepared to offer exam guidance to Coast Guard military and civilian personnel assigned to the Regional Exam Centers. It also serves as the basis for guidance to license candidates. We have made several formal complaints about the quality of information in this publication to the Eighth District Commander and to the Commandant to no avail. [Refer to NL#15 p. 19.]

We received conflicting comments from the former Chief of the Coast Guard's Merchant Vessel Personnel Division (MVP) and the New Orleans REC regarding the unreliability of this publication. We believe it is better to acknowledge and correct faults in this key publication than to try to cover them up and lie about them as was done by the Chief of MVP.

**5. USER FEES FOR COAST GUARD LICENSES.** The current system of license exams administered by the Coast Guard is unfair and unresponsive to merchant mariners in many ways. We believe the proposal to charge a "user fee" for a license or merchant mariner document (MMD) is unwarranted.

Many long-standing problems need to be solved to the satisfaction of merchant mariners in general and maritime educators in particular before imposing an oppressive system of charges for "services" that many mariners view as being flawed. [Refer to NL#17, p. 1; NL#18, pgs. 1-4; NL#22, p. 1; NL#23, p. 5.1]

It appears that the Coast Guard is trying to evade its responsibility of issuing licenses and MMDs by using user fees to reduce its workload. The following statement appeared in the "User Fee" Notice of Proposed Rulemaking (NPRM): "On the other hand, there are people who have no intention of returning to sea who retain their license or merchant mariner document for convenience or some other purpose. As a consequence, some of these individuals may well choose not to renew their licenses or documents. This will benefit the Coast Guard by removing these persons from our records of active mariners..." [Refer to 56 FR 28452, column 3.]

We believe the proposed user fees may well discourage many mariners from renewing their licenses and lead to a further deterioration of the U.S. Merchant Marine. Reports from our members involved with Operation Desert Storm found it extremely difficult to find licensed and documented mariners to man ships of the reserve fleet. [Refer to NL#2, p. 1.1]

We acknowledge and applaud the positions taken by Mrs. Betty Hutto, President of the River School, Memphis, TN relative to this NPRM and adopt the points that she made in her letter dated July 8, 1991. [Refer to NL#18 pgs. 1-3.]

6. **RESOLVE PROBLEMS AT REGIONAL EXAM CENTERS.** It is too time consuming, expensive, and frustrating to continue to tolerate civilian or military employees in any Regional Exam Center who gives license and MMD candidates incorrect, inconsistent or misleading advice and information.

We believe it should be a nationwide policy for each REC employee to wear a nametag to assist candidates and instructors to pinpoint the source of incorrect information at any REC and have it corrected. [Refer to NL#1, pgs. 1, 7, 10; NL#2, pgs. 1, 2, 18; NL#3 p. 13, item #7; NL#8, p. 8]

The high level of employee turnover at the RECs as well as the lack of interest and commitment to merchant mariners by many federal clerical employees makes the collection of any user fee for substandard services hard to justify.

The level of professional knowledge at the RECs has deteriorated over the last 20 years to a point where Coast Guard personnel are no longer expected to have knowledge of the subject matter of the tests they are administering. The standards of professional knowledge manifested by many REC staff members are so low that they are a joke to most working mariners. Although the Coast Guard may require and expect less in the way of nautical knowledge from its REC employees, their pay and job security were not reduced commensurate with their increasing ignorance of the commercial maritime industry. [Refer to NL#2, p. 18.J

A Coast Guard Captain in charge of MSO New Orleans conceded that personnel assigned to the RECs lack the expertise to advise candidates on what to study in order to prepare for a license or upgrade exam. Consequently, we believe that each REC should refer candidates to schools or individuals on the N.A.M.E. Business List and to other maritime educators who file their names at each REC. [Refer to NL#20, p. 1, item 1.]

There have been a number of instances where REC employees have graded candidates' exams incorrectly by using the incorrect answer key or misusing the correct key. Some candidates are not given complete instructions about the test they are being administered. For example, some candidates are never told they can use reference books or make comments or protests after they finish taking an exam.

Coast Guard Headquarters has allowed the exam administrative process to become so complicated and offers such poorly-prepared guidance and instructions to its own personnel that it appears difficult for employees at some RECs to even determine the correct exam module to give to candidates. [Refer to NL#20, p. 2, item 2.]

Some RECs have provided certain failing candidates with the actual module numbers they *will* be given on a re-tests. We believe that this practice displays blatant favoritism and discriminates against many candidates and instructors since it is not applied uniformly in all RECs. [Refer to NL#20, p. 4, item 7.]

We have reported that some Coast Guard personnel, including commissioned officers, were involved in outright dishonesty by selling licenses or exam information. [Refer to NL#13, p. 10.]

The Coast Guard has not and steadfastly refuses to develop any method to credit candidates who have taken and failed an exam with a failing score based on one or more questions subsequently shown to be incorrect. Collecting user fees without fixing this glaring problem will only exacerbate this situation. A candidate already must carry the burden of paying for room, board and travel to retake an exam he fails through no fault of his own. [Refer to NL#1, pgs. 2, 9, 11, 13; NL#2 p. 1; NL#18, p. 5.]

7. **AN ADVISORY COMMITTEE OF MARITIME EDUCATORS.** We believe that if Congress wants to collect user fees for licenses and MMDs, they should first authorize an "Advisory Committee" composed entirely of maritime educators representing all levels of instruction, including license preparation, to help straighten out the mess that exists in the administration of the Coast Guard licensing program both in Washington and at local RECs.

Maritime educators are tired of having their programs, plans, publications and training materials ruined by incompetent hacks in the Merchant Vessel Personnel Division in Washington who constantly tinker with the licensing process while keeping us in the dark as to their programs and direction. Maritime educators hope that the Coast Guard will come to realize that testing and licensing should be a consultive process. [Refer to NL#1, p. 1; NL#4, pgs. 4, 5; NL#8 p. 7.; NL#9 p. 1, 3.; NL#13 pgs. 9, 10.J

We originally supported the concept of the Merchant Marine Personnel Advisory Committee (MERPAC) as a step in the right direction. We quickly discovered that the announcement of its formation in the Federal Register not only was incorrectly stated but was also untruthful in that it all but ignored the interests of mariners serving on vessels under 1600 gross tons and those who instruct them. Consequently, we withdrew our support and addressed an appeal to the Secretary of Transportation. This appeal was not answered in a timely manner. [Refer to NL#21, p. 1; NL#22, pgs. 9, 10; NL#24, p. 1; NL#25, pgs. 16-18.]

8. **REFERENCES TO DATABANK QUESTIONS.** An exam should measure a candidate's knowledge of a subject rather than his ability to locate an obscure fact in a textbook and then remember that answer without recourse to the book. However, a former Chief of the Merchant Vessel Personnel Division stated that: "... availability of supporting references will have no impact upon the Coast Guard's continued use of license questions." We totally disagree with this statement and attitude. [Refer to NL#3 p. 6; NL#5 p. 7; NL#10 p. 7.J

We believe that each exam question in the Coast Guard's merchant marine examination database should contain a clear, correct and accurate reference to available publications that mariners and their instructors can use to verify factual information or learn more about a subject. We believe that questions and answers to the vast majority of non-mathematical questions should be readily available in books and publications that can be found in public libraries or purchased in bookstores.

Although the Coast Guard has provided references for some exam questions, they contend that these references are only for internal Coast Guard use. Consequently, they no longer publish the references for each question as they did in the 1988 edition of the "Yellow Books". This transparent excuse covers up the fact that these references are often incomplete, incorrect, misleading and out of date.

We believe that a valid "reference" must be an integral part of every question. We believe the failure to include current and valid references in the database are unprofessional and needs to be corrected. Corrected references should be made accessible to all mariners by inclusion in the "Yellow Books" printed by the Government Printing Office for the Coast Guard and for sale to the general public. We call upon the Coast Guard to correct and publish references to all exam questions. [Refer to NL#15 p. 1; NL#16 p. 5.]

In reviewing the examination question databank, we have discovered that many "references" provided in the databank clearly do not support some questions and answers that appear on license exams.

Many questions in the databank were developed from publications that are superseded, out of date, out of print or unavailable in libraries. [Refer to NL#3, p. 11.]

We have furnished the Coast Guard with a list of out-of-print publications. [Refer to NL#25, p. 24.]

- 9. REFERENCE BOOKS IN THE EXAM ROOM.** The Coast Guard provides a list of publications that are furnished in the exam room for reference during an exam. Approximately 1 of 6 questions is based on using available reference books. [Refer to NL#30, pgs. 17, 18.]

We commend Captain A.L. Lonsdale, Northeast Maritime, Inc., New Bedford, MA, a N.A.M.E. member, who has prepared a videotape that discusses the use of reference publications in the exam room. [Refer to NL#30, p.17.]

The Coast Guard should notify maritime instructors when a new edition of a reference publication is used in the exam room. For example, the 1982 edition of the Chemical Data Guide, not the 1990 edition, is used in the exam room. The three new training charts provided by NOAA at the request of N.A.M.E. are still not in use in the exam room. [Refer to NL#19, p. 6 and letter of December 1992.]

Copies of U.S. Army Corps of Engineers regulations are not furnished in the exam room even though a number of exam questions are based upon them "because the applicant should know the material without reference to a publication." We disagree with this statement. [Refer to NL#28, p. 4, item 1.]

Copies of Federal Communications Commission regulations are not furnished in the exam room even though a number of exam questions are based on these regulations. [Refer to NL#29, pgs. 9-11.]

Candidates for lower level licenses are asked detailed questions on "Ship's Business" regarding Coast Guard forms and procedures that are no longer in common use at lower levels in the marine industry. Learning such material, and committing it to memory is a waste of time. Consequently, we believe the appropriate NVIC should be provided in the exam room as reference material. [Refer to NL#8, p. 15.]

We challenge the statement that "NVICs are as valid a reference material for questions as Chapman's or Knights". Navigation and Vessel Inspection Circulars are not regulations. Their distribution is not widespread among industry personnel seeking a license although many executives in the industry may "subscribe" to them. Since the Coast Guard provides no specific guidance to those studying for exams containing these questions as to the need to use and the availability of these publications, NVICs - including the annual cumulative index - should be available in the exam room. [Refer to NL#19, p. 13 & USCG Letter dated 7/31/91.]

- 10. ERRORS IN THE CODE OF FEDERAL REGULATIONS INDEX.** As long as the Code of Federal Regulations (CFR) is used as license reference material in the exam room, we believe the Coast Guard has an obligation to fix the serious shortcomings we have pointed out to them in the indices of many "Parts" of the regulations.

Many indices in the Code of Federal Regulations, although misleading and out-of-date, are reprinted without correction year after year. We pointed out these problems to both the Coast Guard and the National Archives. The National Archives contacted the Coast Guard Merchant Vessel Personnel Division which promised to resolve these problems. We are still waiting to see the corrections. [Refer to letter of May 19, 1989 to ADM Yost; NL#24, pgs. 18, 19; NL#25, pgs. 6, 7, 24, 25.]

- 11. PLOTTING PROBLEMS.** The Coast Guard needs to "clean up its act" regarding "plotting problems" (i.e., Navigation Problems) which require a passing grade of 90% on many license exams. [Refer to NL#16, p. 24.]

Maritime educators are fed up with the constant attempts at secrecy and bureaucratic maneuvering that have been used to cover up numerous errors in the Navigation Problems modules. These errors often take a long time to detect and even longer to correct when shrouded in secrecy. We believe many license candidates have suffered unnecessary failures as a direct result of these practices. We call on the Coast Guard to be more open and forthcoming in its discussion of suspected errors and terminate these practices or any employee guilty of perpetuating them. [Refer to NL#9 p. 6; NL#10 p. 1; NL#11 p. 2.; NL#15 p. 12. NL#16 p. 24; NL#23, pgs. 1-3; NL#25, p. 21; NL#26, pgs. 1-3; NL#30, pgs. 3, 4.]

- 12. RENEWAL EXERCISES.** The license renewal exercise is impossible for a person who does not have access to a full set of the Code of Federal Regulations and an extensive nautical library. [Refer to NL#2, p. 14; NL#3, p. 13, item #16.]

We disagree with Captain F.J. Grady's statement that "The renewal exercise can be successfully completed without reference material." [Refer to NL#20, p. 7 & GMVP letter of 12/4/91, paragraph 7.]

We support the introduction of "approved" license renewal courses.

- 13. POOR COORDINATION BETWEEN THE COAST GUARD AND THE GOVERNMENT PRINTING OFFICE.** The Coast Guard cannot seem to get the Government Printing Office to stop making errors filling its public printing orders. We believe that the Coast Guard needs to take steps to monitor the progress of its printing orders so that our tax dollars are not longer squandered. [*Refer to NL#13 p. 12; NL#14 p. 10.*]
- 14. INSUFFICIENT TIME IS ALLOTTED FOR PUBLIC COMMENT TO PROPOSED REGULATIONS.** The ability of mariners to participate in the rulemaking process is restricted by unreasonably brief comment periods. The time allotted to read, study and make meaningful public comments on new regulations and changes to existing regulations is insufficient for many mariners, especially those working at sea. Since most working mariners do not subscribe to the Federal Register and since Proceedings\* is only published every other month, we support an extension of the comment period for all proposed and final regulations that deal with maritime affairs to a minimum of 90 days and a maximum of 6 months instead of the 30 day period commonly used. [*\*Free subscription. Refer to NL#13 p. 15 and NL#18 p. 1.*]
- 15. SHIPMENT AND DISCHARGE OF SEAMEN.** We urge the Coast Guard to update its administrative procedures for the shipment and discharge of seamen. This system is both burdensome and meaningless for most vessels between 100 and 500 (possibly 1600) gross tons. [*Refer to NL#28, pgs. 9-12.*]
- 16. SAFETY TRAINING FOR COMMERCIAL FISHERMEN.** We support realistic, hands-on training for commercial fishermen conducted by qualified maritime instructors. We commend the work done by the Alaska Marine Safety Education Association in preparing and teaching its Coast Guard Approved course to commercial fishermen and instructors. [*Refer to NL#22, pgs. 2-6; NL#23, p. 6, 7.*]
- 17. LICENSING COMMERCIAL FISHING INDUSTRY VESSEL OPERATORS.** We support the Coast Guard's plan to license operators of documented commercial fishing vessels under 200 gross tons as long as that program utilizes "third party training" by qualified maritime instructors as an alternative to a "standard" Coast Guard license exam. [*Refer to NL#22, p. 10; NL#25, p. 1.*]  
 We support the Coast Guard's plan to use "approved" training courses (i.e., "third party training") that meets reasonable minimum Coast Guard standards as one method of training persons to obtain commercial fishing vessel operator licenses.  
 We believe that success of this program will depend upon active visitation of classes and verification of approval standards by knowledgeable Coast Guard personnel.  
 We believe that similar training is equally valid for most other lower level licenses. We commend the Alaska Vocational Technical Center, Seward, AK and the Charter Captain's Course, Milton, DE for developing training programs for lower level licenses that meet the high standards that merit Coast Guard approval.
- 18. COMPUTER ASSISTANCE.** We commend the work of William Sheppard in turning the computer tapes obtained from the Coast Guard's mainframe computer as a result of our Freedom of Information Act and subsequent appeal into usable training materials that have benefitted maritime instructors and their students.  
 We also recognize his contribution at considerable personal expense in money, time and talent to establish an electronic bulletin board to serve maritime instructors and to assist the Coast Guard in resolving problems with questions in the databank.  
 The refusal of the Coast Guard to participate in the bulletin board has led to our publication of several hundred of their errors in our Newsletter as the only alternative to keeping our colleagues informed.
- 19. THE TWO WATCH SYSTEM.** We urge Congress and the Coast Guard to re-evaluate the safety of the "Two-Watch-System" which requires a minimum of 12 hours on duty for watchstanders each working day. We believe that long working hours extending over long periods of time overworks and overstresses both licensed and unlicensed crewmembers.  
 We believe that any modification of the two-watch-system, including its outright abolition, has the potential to increase safety, improve working conditions in the industry and assure the attraction and retention of more highly qualified personnel. [*Refer to NL#17, pgs. 9, 10; NL#23, pgs. 17, 18; NL#24, p.6. J*]
- 20. AUTOMATED PERSONNEL RECORDS.** We urge the Coast Guard to take action on implementing the License Study Draft Automation Study Report prepared under Contract #DTCG-23-88-C-10077 in 1989. [*Refer to NL#24, p. 21.*]
- 21. SPECIAL LICENSES FOR SPECIAL PURPOSES.** We believe that the OCMI's authority to issue special limited licenses for special purposes should not be abused for the benefit of special interests since there is a large pool of fully qualified, licensed personnel available in the marine industry.  
 Whenever a Regional Exam Center authorizes a special limited license for any purpose, we believe that it should provide the license candidate with a letter that specifies in detail the training and testing requirements for that special license since the regulations contain no guidance on that matter. [*Refer to NL#29, pgs. 4,5; NL#30, p. 18.*]