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GCMA REPORT #R-421

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GCMA SUGGESTIONS FOR AN APPRENTICE MATE/STEERSMAN MODEL TRAINING COURSE

[Editorial note: This paper was submitted to the Towing Safety Advisory Committee (TSAC) Licensing Working Group in advance of their meeting on December 1, 2005 in Arlington, Virginia.]

Preamble. Existing regulations call for an Apprentice Mate/Steersman to have served eighteen months on deck, twelve of which must be on a towing vessel, before he becomes eligible for one-year of pilothouse training.

The Coast Guard has no means of verifying this eighteen months service on deck except through the “sea service” letters a mariner submits to the Coast Guard before it evaluates his formal application for an Apprentice Mate/Steersman “learners permit. The veracity of many of these letters has been questionable in the past, but recent enforcement activities by the Coast Guard guarantees greater truthfulness by those who submit such letters.

The candidate for an apprentice mate/steersman “learner’s permit” must either complete a Coast Guard-approved course or pass a “book knowledge” exam comparable to the old “Operator of Uninspected Towing Vessel” license exam at a Regional Exam Center before receiving his permit. There is no current requirement that a candidate for the apprentice mate/steersman’s “learner’s permit” attend school at a cost of up to \$1,000 although many candidates choose to do so. Towing companies may or may not assist candidates financially. However, this so-called “learner’s permit” is **NOT** a license. It does **NOT** allow its holder to stand a watch alone or operate the vessel alone under any circumstances – a fact that some companies and candidates choose to ignore at their own peril. It is only valid under the direct supervision of a licensed master or mate/pilot of towing vessels. GCMA, having participated in the deliberations leading up to this rulemaking, sees no need to change this regulation in any manner.

1. Formal training required during apprenticeship.

During his one-year (360-day) training period before becoming eligible for a license as Mate/Pilot of Towing Vessels, the candidate must be trained by the licensed officers

he works under (i.e., the master and/or mate/pilot) so that he can complete the standard Coast Guard-approved Towing Officer Assessment Record (TOAR) appropriate to the waters he operates on. These blank TOARs are available as GCMA Reports #287A-D and represent the goal of pilothouse training.

The apprentice mate/steersman also must obtain formal radar observer training appropriate to the waters he plans to operate on by attending a Coast Guard-approved course before he applies for his mate/pilot license at the close of the training period. The regulations are silent on who pays for this training.

The apprentice mate/steersman also must obtain an FCC Restricted Radiotelephone Operator Permit required by 47 CFR §80.163-.165 and the Bridge-to-Bridge Radiotelephone Act. These are legal requirements.

Maritime security training must be completed as required.

2. Possible future formal training requirements.

AIS training. Towing vessels of more than 600 horsepower are required to be fitted with a properly installed Automatic Identification Systems (AIS) by 33 CFR §164.46 when operating within a VTS system. Future regulations currently under consideration may include additional vessels and locations. To date, the provisions for training mariners to operate their installed AIS properly have taken a back seat to selling and installing this equipment. It should become clear to the Coast Guard that adequate training on this equipment must be provided for mariners training for pilothouse positions.

ECS & ECDIS training. Congress required the Coast Guard in §410 of the Coast Guard and Maritime Transportation Act of 2004 to equip towing vessels over 26 feet in length and 600 horsepower with electronic charts while navigating upon the navigable waters of the United States. The Coast Guard is supposed to prepare these new regulations before January 1, 2007. It is clear that mariners will need to be trained to use this equipment. The U.S. Army Corps of Engineers has developed electronic charts for the Mississippi River. This equipment is already in use on the western rivers with or without adequate training. We note that the same situation existed in regard to radar training before the infamous Bayou Canot accident. Adequate training should precede rather than follow equipment sales and installation.

Fire Training: In GCMA Report #R-276, Revision 9, Item #78 we explain in detail why formal firefighting training should be required for all licensed officers and indicate that it should also be given to apprentice mates/steersmen in light of the large number of towing vessel fires. This recommendation was filed in Coast Guard Docket #USCG-2004-19977 for consideration in the towing vessel inspection rulemaking.

3. Submit an application for the mate/pilot license. To step up to mate/pilot at the end of the training period requires the candidate to submit a formal application including proof of sea service in the pilothouse. However, there appears to be a problem in certain Regional Exam Centers as to exactly what this sea service letter must say and as to the number of hours each training day represents. Apparently, the National Maritime Center has not issued national specifications as to the composition of this letter – and this shortcoming has

adversely affected a number of our mariners. This goes to the heart of a major shortcoming of the program – its failure to specify the amount of time a person must spend in the pilothouse undergoing training.

4. The “training day.” Some companies assign an apprentice mate/steersman as an extra hand to learn the job. GCMA favors this approach. Yet it appears that more towing companies expect their apprentice mates/steersmen also to fill a crew slot as an unlicensed deckhand, deckhand/cook, engineer, deckineer, or tankerman and to spend their “free time” after completing required duties in the pilothouse undergoing training. Unfortunately, this takes advantage of a current loophole in the law that allows unlicensed crewmembers to work for an unlimited number of hours on inland waters. GCMA is extremely critical of this practice. Yet, to our knowledge, no existing regulation, policy letter, or NVIC even hints at how many hours each day an apprentice mate/steersman must spend “training” in the pilothouse. Accumulating meaningful training time in all aspects of pilothouse training – even if this time is broken – is the purpose of this entire exercise. We suggest that a license evaluator has a legitimate problem evaluating a straight “sea service” letter that glosses over these points. To accommodate the industry while recognizing the needs of our mariners to advance toward mate/pilot at a steady pace, we suggest that 6 clock-hours be creditable as one “training day.” If simulation in any approved course replaces any daily training evolutions normally conducted in the pilothouse, it should be acceptable on a day-for-day exchange basis.

5. Recognition for the “old” apprenticeship system. The “old” system for training cub pilots is described in Captain David Whitehurst’s Letter of November 13, 2005 [**Enclosure #1**]. However, this system no longer produces enough mates/pilots to satisfy the needs of the towing industry directly resulting from the disruptions of the 1998 “Pilots Agree” strike. Many older, experienced, licensed mariners want the choice to select and then train the person(s) who complete their deck time, prove their competency on deck, and additionally demonstrate a positive attitude to advancing to the licensed position of mate/pilot. Unfortunately, the new “apprentice mate/steersman” system did not accommodate the older system. To attempt to have older licensed officers use the new company-oriented system may be counterproductive as regards a company’s output of qualified mates/pilots. Unless these experienced mariners are given the latitude to follow the old system, they may formally or informally opt out of training new mates/pilots.

6. Incentives. Consideration should be given to providing cash incentives for training mate/pilot candidates in the pilothouse. Training can be a very stressful period for the trainer – often more stressful than handling the boat itself.

7. Participation in OJT instruction should be voluntary. An apprentice mate/steersman training program must not interfere with the work of mariners who do not wish to participate in the program. Many mariners simply are not interested in training cub pilots for a number of reasons.

8 Do not violate the twelve-hour rule. No licensed master

or mate/pilot who participates in a training another mariner must be called upon to violate the 12-hour rule in order to do so. We set out as a longstanding and irrefutable **example** the Verret Case as reported in GCMA Report #R-370.

9. General knowledge. When he is first approved for wheelhouse training completing 18 months work on deck, an apprentice mate/steersman, through observation alone, already should have a general idea of what a towing vessel will do and what it is not capable of doing.

10. The route. Much of the experience gained during the apprentice mate/steersman’s training period will depend upon the route(s) the vessel follows and the actual experience he has in piloting and navigating that route. A very short route completed on repetitive trips results in very limited experience. Consequently, the apprentice mate/steersman should be given the broadest opportunity to gain experience on a wide variety of routes under different conditions – and should record those experiences.

11. Experience in boat-handling. A deckhand who only is trained to steer the tow along the designated route may not gain the necessary experience in boat handling as regards making landings, making and breaking tow, and other evolutions that normally take place while he is working out on deck. Although he may be able to perform these maneuvers under controlled conditions for a Designated Examiner, he may lack the depth of experience (and the confidence) he will be called upon to exhibit as a Mate/Pilot and, a year later, as Master. Consequently, he may not be able to pull his full weight when he is licensed to stand the watch alone.

12. Route familiarization and knowledge. The apprentice mate/steersman, during his pilothouse training period must develop a thorough knowledge of each route starting with a knowledge of the charts or maps of the area and upon the principles of voyage planning as outlined in 33 CFR §164.80(c). This includes, among other things, physical features such as the harbors, channels, bridges, pipelines, cable crossings, bends, dikes, revetments, and aids to navigation. He should be aware of water depths at various river stages and/or tide levels, currents, weather phenomena and their effect on the vessel.

Although the voyage planning regulations currently do not apply to western rivers and the Intracoastal Waterway, the report of the Coast Guard investigation of the Queen Isabella Causeway Accident indicates that this is a shortcoming in the regulation itself – one that GCMA believes must be remedied in future rulemaking.

13. Record of training routes. We suggest that the Coast Guard request a record of the extent of the apprentice mate/steersman’s route experience at the time he applies for his mate/pilot license. We suggest furnishing him with a blank, broad outline map of the waterways and have him “highlight” the actual routes he has followed during his training in the pilothouse and estimate the number of round trips made over each segment. Even though a licensed mariner may change jobs and move into new territory after he has obtained his license, he must understand that it is his duty to become posted on each new route. At the same time, the

Coast Guard should take a stand against the policies of some employers to solve manning problems by putting any "warm body" on any towing vessel going anywhere at any time in order to protect the waterways infrastructure. While such a concept would be hard to enforce, Coast Guard investigators need to have this type of information at hand to ask meaningful questions at an accident scene if any newly-minted mate/pilot has an accident early in his career.

14. An apprentice mate/steersman should maintain a personal diary (e.g., dated record) of all his training activities. The person who supervises his daily training should sign these pages on a daily basis during the training period and certify to the veracity of the entries wherever possible. Most river pilots maintain a personal log of their daily activities so that they can refer to vessels they served on as to employment dates, tasks accomplished, routes followed, the number of trips over a particular route in daylight and in darkness, and other specific data pertinent to becoming a pilot. This is especially important if planning to serve "as a pilot" (46 CFR §15.812(b)) in pilotage waters. Such a requirement would give greater encouragement, stature, and credibility to maintaining such a document.

15. Learn the paperwork. Apprentice mates/steersmen must learn to do the paperwork that towing vessel officers are responsible for. "Paperwork" is a general term that includes filling making all sorts of logbook entries, accident or injury reports, security assessments, equipment inspections, inventories, requisitions, and chart corrections required by employers, by safety management systems, and by Coast Guard regulations. He must file some of this "paperwork" by computer that he must learn to use proficiently. He must transmit some reports by radio that he must use effectively. Part of the apprentice mate/steersman training should be to assist in the preparation of these reports so that he can handle them properly when he attains his mate/pilot license.

16. Emergency situations. Current regulations only require "fire drills" on towing vessels. GCMA Report #R-276, Revision 9, Items #12 and 62 are critical of this apparent oversight. An apprentice mate/steersman needs to be thoroughly trained in man overboard drills, security drills, and abandon ship evolutions in addition to fire drills. At present, partly resulting from inadequate manning, many vessels only conduct "paper" fire drills. He must also be trained in how to handle groundings, tow break-ups, and collisions as he will have to lead drills and serve as a lead man as soon as he is licensed as a mate/pilot. An apprentice mate/steersman must also receive thorough rescue boat training as described in GCMA Report #R-276, Revision 9, Item #77 so that he will be prepared to make best possible use of that asset and properly train its crew when he finally earns his license.

17. Knowledge of regulations. GCMA is not convinced that apprentice mates/steersmen receive sufficient training in federal regulations that apply to towing vessels, barges, dangerous cargoes, pollution prevention, marine sanitation devices, and radiotelephone procedures. In addition, since the Coast Guard can enforce the dictates of company policies in suspension and revocation proceedings, the apprentice mate/steersman must show his knowledge of these subjects.

He should understand the specific requirements of any safety management system that explains or reinforces federal regulations.

18. Designated examiner. The position of the Coast Guard-accepted Designated Examiner should be that of a neutral party. This way, there should not be any threat of a job loss as a deciding factor in approving or disapproving any item on the TOAR for an apprentice mate/steersman. Any conflict between the role of a Designated Examiner and a trainer should be resolved before a Designated Examiner signs off on any candidate for a mate/pilot license. Designated Examiners should be encouraged to report such conflicts to the National Maritime Center that should be charged with resolving them.

19. Designated examiner. Some provision must be made to examine mate/pilot candidates when an employer does not have access to a Designated Examiner (e.g., on his payroll). The National Maritime Center should obtain permission to release the phone numbers and contact information for any Designated Examiner that may be available to examine a candidate on an independent basis. We understand that this information was withheld under the Privacy Act on the current list of Designated Examiners. The question of insurance coverage needs to be considered in cases where an independent Designated Examiner can evaluate candidates on vessels under these conditions. Simulator evaluations may need to be considered in light of the large number of independent towing vessel owners.

20. Some companies still do not get the message. We have heard of one company operating approximately 30 towing vessels on the Lower Mississippi River operating from Baton Rouge, LA. This company is a member of the AWO. AWO should be an excellent source of information on the apprentice mate/steersman program. Yet, this company apparently has not provided meaningful guidance to mariners who believe they are taking the necessary steps toward certification as apprentice mates/steersmen. This may be a management failure to buy into the need to train candidates for pilothouse duty. Yet it ignores current regulations that have been on the books since May 2001. Nevertheless, these training regulations are voluntary in nature and some companies apparently do not believe they have any training responsibilities. A model training program might be helpful to those companies who finally realize there is no "quick fix" to their pilothouse personnel problems.

By not accepting responsibility for training or even taking the time to learn the regulatory requirements, this company (and probably many others) leave it up to individual candidates to either "sink or swim." Chances are that these candidates will either sink in the bureaucratic details or find work with another company that takes its training program seriously. However, no penalty will accrue to the company until the Coast Guard begins to check towing vessels carefully to determine if they carry the requisite number of properly licensed officers.

ENCLOSURE #1

November 13, 2005

To: TSAC License Working Group
Subject: In-house Wheelhouse Training Programs for
Apprentice Mates/Steersmen

Although 12 months wheelhouse training may seem like a very long time in fact I feel that time should be closer to 24 months.

I have been running boats from the age of three or four years old. My mother would put me standing on wooden coca-cola crates to steer our shrimp boat. I really do not think that I ever made a trip on any boat where I did not learn something.

I was trained by some of the most-experienced Captains in the towing business back in the late 1960s. I was fourteen years old when Capt. Floyd Fontenot first let me steer a towboat. I was seventeen years old the first time Capt. Wilbert Lange let me stand a watch by myself.

I was already a Captain on a small 600 horsepower model-bow tug by the time the OUTV license program was adopted in 1973. Although the OUTV was set up to fix the problems of training and licensing personal to operate a uninspected towing vessels, what it really did was take out the professionalism. Before the OUTV there were towboat pilots that were proud of their boat-handling skills although most could not read or write their own names. With the OUTV licenses, they were gradually replaced by "Towboat Drivers." These "towboat drivers" may have high school diplomas but many cannot run a towboat.

I started out working in the Intracoastal Canal working on towing vessels. Then I moved to working in the barge fleets between Baton Rouge and New Orleans. I went to work for Spanier Marine on a 1000-horsepower boat with a two-barge tow running to Lemont, Illinois. I tried for years to break out on to linehaul work on the Lower Mississippi River. To do that, I would call companies that operated larger boats on the river. The answer was always the same: "You do not know the river."

In contrast, nowadays, companies like ☺ ☺ ☺ ☺ ☺ ☺ ☺ ☺ Transportation put pilots that have never even seen the Lower Mississippi River on large 5600 to 7000-horsepower towing vessels pushing 25 to 35 barges headed northbound. The pilots are called "Dedicated North Bound Dudes."(DNBD). This is what the companies now call "training." The pilots are paid very low wagers. On my last trip I had one DNBD "pilot" behind me from Baton Rouge, La, to Greenville, MS. He was lost and even stated so on the VHF radio and told me his tow was going to St. Louis, MO. This was his first trip ever on the Lower Mississippi River and he was pushing a 30-barge tow.

Training takes time – lots of time. ☺ ☺ ☺ ☺ ☺ has a Coast Guard-Approved training course. However, if you want to get first hand knowledge of the course, you need to get on a towboat and make a trip or two in the canal and meet some of these "☺ ☺ ☺ ☺ ☺ -Approved Boat Drivers." There is a saying in the canal: "Get over, here comes a☺ ☺ ☺ ☺ ☺ boat."

In my opinion, it takes a good boatman to make a good boatman. If the individual that is to be trained shows interest and has common sense along with a feel for the boat he/she just may make a pilot. This is why, in the old days, the Captain hand-picked the person he was going to train.

I really don't think that towboat pilothouse training can be reduced to book form. Piloting a towboat is all about

developing a "feel" for the boat, and a feel for the job; to get the feel takes time.

It is a real art to maneuver a towboat. As a "trip pilot," the first thing I do when I get behind the sticks on any towboat is what the old-timers called "shaking hands with the boat." My job requires me to work on towboats of all sizes and descriptions from the smallest to the largest boats owned by a wide assortment of companies – often on very short notice.

Most of today's young pilots that I have run into simply won't listen. They claim to know it all and won't admit it when it is clear that they don't. I have tried to work with some of these Wal-Mart pilots.

The main problem today is no one wants to take the time to train anyone. Why should they when there really is nothing in it for them. There is no extra pay or recognition for the knowledge that takes years to accumulate. Why should a pilot just give their skills away for free when many operating companies treated their licensed mariners like red-headed step-children for years. Even AWO and TSAC refuse to listen to anything that our professional mariners have to say.

The towing industry has changed over the years. It has gone from respecting its boat crews to degrading them. I remember when the Captain said he would push no more barges that was it – "CASE CLOSED." Today, if a Captain tells the barge dispatcher he cannot handle any more barges, that Captain can look for another job.

I have experienced "blackballing" at the hands of a number of towing companies that refuse to us my piloting services because I am a member of the Gulf Coast Mariners Association and dared to speak out at a number of TSAC meetings about how unsafe towing industry practices really are. For my efforts, I have been called a whistleblower, rabble-rouser, and hot potato just to name a few. In fact my boating skills are of little interest to these towing companies although I can point to the fact that I have a very low accident and grounding rate.

In closing, I truly feel that the true skills of piloting a towboat can never be taught from a book or in a classroom other than the pilothouse of the vessel with a competent instructor who will watch over the cub-pilot and keep the cub out of trouble. The instructor must be willing and able to pass along his talents and show the cub that there is more than a paycheck to being a pilot. There is pride and it is a great honor to carry the title of Master.

Very Truly Yours;
Capt. David Whitehurst
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Master of Towing Vessels, Seventh Issue
Member, Board of Directors
Gulf Coast Mariners Association