

**Thanks for sending this along! We have incorporated these questions into our Questions for the Record for Admiral Allen. Hope this helps us get some answers!**

**-Jeff Watters  
Aide to Senator Cantwell**

Thursday, March 20, 2008

Below is the response we got from the Coast Guard:

**Question:** Could you please explain proposal USCG-2006-26202? My understanding is that this proposal would drastically reduce the training requirements for towing vessels.

Can a fully-qualified Mate of a Towing Vessel, for use in a 2-watch system, actually be produced in 30 days?

When and how did the Coast Guard reach the conclusion that the current training requirements were too burdensome and no longer necessary?

I assume that the Coast Guard has consulted extensively with the maritime industry on this issue, but to what extent did you consult with actual mariners such as Captains on whether this reduction in training would be harmful or helpful?

**ANSWER:** *The Coast Guard has not proposed to cut the training for tugboat pilots from 30 months to 30 days. As proposed in the Notice of Proposed Rulemaking (NPRM) published on September 17, 2007, the alternate progression candidate for mate (pilot) of towing vessels needs a total of 36 months of service as master of steam or motor vessels not more than (NMT) 200 GRT, in addition to the sea service required to obtain the underlying master NMT 200 GRT license, which is at least 12 - 36 months, depending on the specific type of NMT 200 GRT master license held.*

*The alternate progression candidate must also complete a Towing Officer Assessment Record (TOAR) or approved course in lieu of TOAR, pass an examination, and complete at least 30 days training and observation on towing vessels in order to obtain a mate (pilot) of towing vessels license.*

*This NPRM was developed in response to three separate petitions for rulemaking submitted to the Coast Guard in accordance with 33 CFR 1.05-20. It was positively endorsed by the Towing Safety Advisory Committee (TSAC), which strongly supports the alternate progression and recommends that it be implemented as soon as possible. TSAC has working mariner representation on the committee. We also received a number of positive public comments posted to the docket for the NPRM.*