



**INCLUDING AN ADDITIONAL PILOT FOR EACH DISTRICT IN THE COAST GUARD'S  
AUTHORIZED RATE IS NECESSARY TO ALLOW PILOT ASSOCIATION PRESIDENTS  
TO COMPLETE THEIR REQUIRED DUTIES**

**September 1, 2020**

Director Haviland:

During recent discussions about the Great Lakes pilotage staffing model and authorizing the appropriate numbers of pilots for each pilotage district on the Great Lakes, you asked for an overview of the duties of a U.S. Great Lakes pilot association president. Rather than provide you with three separate responses, we thought it best to submit one letter on behalf of the Western Great Lakes Pilots Association, the Lakes Pilots Association, and the St. Lawrence Seaway Pilots Association. The three presidents are in full agreement that the necessary and required non-piloting duties of a pilot association president that require his attention and are not merely "administrative" duties that can be performed by staff easily justify for a full-time pilot position (what a government agency or business often refers to as full-time equivalent employment or FTE) that could and should be authorized in the rate.

At the outset, we would like to offer a clarification. In previous discussions with your office, a pilot that was authorized in the rate but would not engage in full-time piloting (e.g., the association president) was generally referred to as an "administrative pilot" or "admin pilot." This is not the most appropriate term. While the presidents' duties certainly include functions that are "administrative" in the sense that they do not involve the direct provision of pilotage services to vessels (e.g., budgets, insurance, bills, accounts, payroll, HR, infrastructure procurement/upkeep/repair, etc.), in order to be most effective in carrying out these and other more pilotage-related responsibilities the work must be grounded in a thorough understanding of piloting and pilotage operations. Therefore, even if the term is not expressly used in current ratesetting regulations or notices of proposed rulemaking, for discussion purposes the more accurate description of such a pilot would be "operational pilot" or "ops pilot."

A 24-hour, seven day a week pilotage operation requires the president as an operations pilot to give constant attention to details regarding ship movements, working rules, dispatching, ground transportation and managing the tour de role to ensure the pilotage operation runs smoothly. Interactions between vessels departing and arriving, as well as tug use questions are a very common occurrence and often must be handled with a high degree of sensitivity. The presidents also consult with pilots on weather and other operational considerations related to non-routine pilotage assignments. In short, pilots on ships, as well as dispatchers and transportation coordinators, need operational support readily available in real-time from a seasoned and experienced piloting professional. This professional is the

association president, or for purposes of setting appropriate numbers of authorized pilots for each group, the “operations pilot.”

As you requested, below is an overview of the pilot association president’s duties. Pilot association operations and business-related issues are of course fluid, ever changing and unique to the pilotage district in which they occur. Nonetheless, the below offers a useful and non-exhaustive summary of some of the more typical operational duties of association presidents:

- The pilot association president is the chief executive officer and the association’s primary spokesperson to the public, shipping industry, broader maritime community, government agencies (local, state, and federal), and the media.
- A principal day-to-day duty of the president is providing respected internal leadership and direction to the pilots, the office, dispatch, pilot boat crews, pilot boat maintenance staff, and drivers.
- While the pilots operate on a tour de role, the rotation, dispatching and myriad transportation issues require continual attention and frequent intervention by the president.
- Although piloting is a personal service provided by an individual, pilotage operations are unavoidably capital intensive. A modern, safe, efficient and reliable pilotage operation requires the most highly qualified pilots, as well as such things as pilot boats and crews, dispatchers, training programs, radios, sophisticated electronic navigation equipment (e.g., portable pilot units or PPUs). This necessary infrastructure is managed and overseen by the association president, which allows the other pilots in an association to focus on safely piloting ships.
- The procurement, maintenance and upgrade of pilot boats and pier/dock facilities in particular is a task that requires an inordinate amount of time, research, planning, effort and expertise on the part of the president.
- Presidents work closely with vendors to select appropriate PPUs, tailor PPUs to meet the unique demands for each pilotage District and to develop appropriate training programs.
- A key part of the president’s duties relates to workforce development and mentoring (including both pilots and non-pilot employees), as well as recruitment. The pilot recruitment effort is extraordinarily time-consuming as it relates to identifying the most qualified applicants for pilot openings and getting these individuals to apply.
- A considerable amount of the President’s time is spent working with, speaking with and meeting with the Coast Guard Director of Great Lakes Pilotage (Director) and his staff. This includes regular meetings in Washington, DC, hosting these Coast Guard officials at local pilot offices and stations, and numerous conference calls. This work with the Director includes analyzing and providing detailed comments on the Director’s proposed ratesetting regulations; developing association working rules and ensuring such rules are approved by the Director and kept up-to-date; and creating training plans and working with both the Director and training centers around the country to implement these plans.
- A large portion of the president’s time – throughout the year – is focused on preparing for financial audits associated with ratesetting and Coast Guard oversight of U.S. Great Lakes pilotage operations and working directly with the auditors.
- The president is the primary liaison with key government officials, including the Ninth Coast Guard District, local Coast Guard Captains of the Port, St. Lawrence Seaway authorities (U.S. and Canadian), Customs and Border Protection, RCMP, etc.

- The work the presidents do in coordinating with the St. Lawrence Seaway Development Corporation and the Coast Guard on the seasonal opening and closing of the Seaway requires a significant investment of time.
- The president represents the pilots' association at the frequent meetings and teleconferences with the shipping industry, agents, tug companies and port officials.
- The president is the designated representative for the pilots' association at meetings of critical organizations and advisory committees, such as the Great Lakes Pilotage Advisory Committee, Area Maritime Security Committee / Maritime Safety Committee, American Pilots' Association, International Joint Commission, etc.
- As the designated representatives of the pilots' associations, the presidents frequently travel to educate public officials on pilotage operations on the Great Lakes and the navigational safety and environmental protection value of pilotage, often in tandem with, or at least coordinated with, Coast Guard officials.
- The president works with the association's accountants in developing and executing association budgets.
- The president manages all aspects related to every category of employee, including administrative, boat crews, dispatchers, maintenance, drivers, etc.
- The development, continual adjustment, implementation and enforcement of COVID-19 protocols to protect the pilots, employees and pilotage operation require considerable time and effort on the part of the president.

In closing, it is instructive to note that beyond Great Lakes pilotage ratesetting, the Coast Guard recognizes how important the duties of a pilot association president are and how they are closely related to the operations of a pilots' association. Specifically, under 46 CFR § 10.232(g) carrying out the duties of a pilot association president is routinely recognized as serving in "a position closely related to the operation...of vessels", and is counted as a portion of (e.g., can be substituted for) the required sea service needed to renew a U.S. Coast Guard Merchant Mariner Credential. In other words, the Coast Guard understands that serving as a pilots' association president is time-consuming, significant and is closely related to pilotage operations.

Again, the above overview certainly does not include every conceivable duty that may arise for a pilots' association president in the ever-changing world of pilotage, but it does provide a good general description. The overview makes amply clear that completing such duties requires a seasoned and experienced piloting professional to devote a very large portion of time. Again, we are of the strong view that these presidential duties take up all of our workdays and justifies inclusion of an "ops pilot" in the rate.

Thank you in advance for reaching out with this request for information. Please let us know if you would like to discuss this matter further.

Sincerely,

*John Boyce*

Capt. John Boyce  
President  
St. Lawrence Seaway Pilots

*Danny Gallagher*

Capt. Danny Gallagher  
President  
Lakes Pilots Association

*Jon Olney*

Capt. Jon Olney  
President  
Western Great Lakes Pilots