



Port of Corpus Christi

Pilot Board

Tuesday, July 8, 2014 8:00 AM

NOTICE OF MEETING

The Port Commission (“Commission”) of the Port of Corpus Christi Authority (“PCCA”) will hold a Pilot Board on **Tuesday, July 8, 2014, at 8:00 AM**, at the Congressman Solomon P. Ortiz International Center, 402 Harbor Drive, Corpus Christi, Texas..

Persons with disabilities who plan to attend this meeting and who may need auxiliary aids or services are requested to contact Sherry DuBois at 885-6174 at least 48 hours in advance so that appropriate arrangements can be made.

Si usted se dirige a la junta y cree que su inglés es limitado, habrá un intérprete inglés español en la reunión de la junta para ayudarle.

Members of the audience will be provided an opportunity to address the Port Commission. Please speak into the microphone located at the podium and state your name and address. Your presentation will be limited to three minutes.

PUBLIC NOTICE is given that the Commission may go into executive session at any time during the meeting to discuss matters listed on the agenda when authorized to do so by the provisions of Section 418.183 or Chapter 551 of the Texas Government Code. In the event the Commission elects to go into executive session regarding any agenda item, the presiding officer will publicly announce the section or sections of the Texas Government Code authorizing the executive session.

The agenda for the meeting is as follows:

1. Call meeting of the Pilot Board to order and receive conflict of interest affidavits.
2. Approve the minutes of the Pilot Board meeting held on June 10, 2014. 3
3. Comments from the public. *(Each speaker will be limited to three minutes)* 6
4. Receive an update report from Capt. Joe Harrington, Chairman of the South Texas Waterways Advisory Committee (STWAC), regarding the committee's work and general waterways update. 7
5. Receive update from Port staff concerning the Work-Rest Requirements for the Aransas-Corpus Christi Pilots, which will be included in the Pilot Board's Rules and Regulations Governing Pilots and Pilotage on the Corpus Christi Ship Channel.. 8
6. Adjourn

**OFFICIAL MINUTES OF PILOT BOARD MEETING
JUNE 10, 2014**

The Board of Pilot Commissioners for the Port of Corpus Christi Authority (the “Pilot Board”) met on Tuesday, June 10, 2014, at 8:00 a.m., at the Congressman Solomon P. Ortiz International Center, 402 Harbor Drive, Corpus Christi, Texas.

Commissioners Present: Ms. Judy Hawley
Mr. Richard Borchard
Mr. Charles Zahn
Mr. Al Jones
Ms. Barbara Canales
Mr. David P. Engel

Staff Present: Mr. John LaRue
Mr. Frank Brogan
Mr. Tony Alejandro
Mr. David Krams
Mr. John Pasch
Ms. Sherry DuBois
Mr. Tyler Fuhrken
Ms. Sarah Garza
Mr. Bland Chamberlain
Mr. Bennie Benavides
Ms. Sonya Lopez
Ms. Liz Cantu
Mr. Matt Garcia

Others Present: Mr. Leo J. Welder, Jr.

Others Present: Mr. Rick Valls
Valls Group
Capt. Jay Rivera
Capt. Bobby Grumbles
Mr. Kevin Monaco
Aransas/CC Pilots Assn.
Ms. Lillian Riojas
Capt. Joe Harrington
Valero Refining
Mr. Roger TenNapel
Flint Hills Resources
Mr. Chris Ramirez
Caller-Times
Mr. Richard Russell
AET
Mr. Xavier Valverde

G&H Towing
Mr. Blane Withe
Heldenfels

I.

Chair Hawley called the meeting to order and asked for any conflict of interest affidavits. None were submitted.

II.

Upon motion duly made and seconded, the minutes of the Pilot Board meeting held on May 13, 2014 were approved in the form presented to the meeting.

III.

Chair Hawley asked for comments from the public. None were received.

IV.

The Pilot Board received a report from Capt. Joe Harrington, Chairman of the South Texas Waterways Advisory Committee (STWAC), regarding the status of the work of STWAC's ad hoc committee on the proposed Fatigue Management Guidelines for the Aransas-Corpus Christi Pilots.

V.

On motion made by Mr. Zahn and seconded by Mr. Jones, the Pilot Board acknowledged receipt of two letters from Capt. John Williams, Presiding Officer of the Aransas-Corpus Christi Pilots to John LaRue, concerning the proposed Work-Rest Requirements for the Aransas-Corpus Christi Pilots.

VI.

The next agenda item was to, "Hear comments concerning the proposed Work-Rest Requirements for the Aransas-Corpus Christi Pilots." On motion made by Mr. Zahn and seconded by Mr. Borchard, the Pilot Board tabled this item and requested staff to research other ports concerning their Work-Rest Requirements for harbor pilots and report back at the July Pilot Board meeting.

VII.

This next agenda item was to, "Consider and possibly adopt the proposed Work-Rest Requirements for the Aransas-Corpus Christi Pilots as Rules of the Pilot Board." On motion made by Mr. Zahn and seconded by Mr. Borchard, the Pilot Board tabled this item.

VIII.

This next agenda item was to “Take any other action the Pilot Board deems appropriate concerning the proposed Work-Rest Requirements for the Aransas-Corpus Christi Pilots.” On motion made by Mr. Zahn and seconded by Mr. Borchard, the Pilot Board tabled this item.

IX.

There being no further business, the meeting adjourned at 8:09 a.m.

AGENDA ITEM NO. 3

No Attachment

AGENDA ITEM NO. 4

No Attachment

Aransas-Corpus Christi Pilots

Work-Rest Requirements

A pilot's maximum work hours are 13 hours in any 24 hour period.

Work is defined as the time a pilot is performing his or her duties as a State commissioned and licensed pilot.

After a Pilot has completed 13 hours of work in any 24 hour period, he or she is entitled to ten hours of rest. A Pilot who works 13 hours in the preceding 24 hour period will not be dispatched to a vessel until the ten hour off duty period has been satisfied. In any 24 hour period the pilot must have at least one 6 hour uninterrupted rest period.

The pilot has the duty to refuse an assignment if the pilot deems himself or herself insufficiently rested or unfit.

The hours worked by a pilot shall be documented by the pilot and verifiable by the Board of Pilot Commissioners.

The requirement for rest periods listed above need not be maintained in the case of emergent and unforeseen overriding operational conditions specific to a vessel's transit and where the ability to relieve a pilot is deemed impossible or impracticable.



Federal and International Rules Governing Work, Rest and Duty for Mariners

The American Pilots Association (APA), local APA-member pilot groups, pilot oversight organizations, and individual pilots have been focused on fatigue and its potential dangers for many years. Although there has been, and should continue to be, collaboration between and among local pilot associations, oversight bodies and the APA regarding fatigue mitigation approaches, including pilot work and rest schedules, those familiar with pilotage understand that there cannot be a one-size-fits-all approach. As with most aspects of a professional pilotage operation, work rules must conform to the nature, timing, routes, and flow of ship traffic in a particular pilotage area. What is an effective and appropriate work schedule for one port may not be the best approach in another.

There are various federal and international rules governing the work and rest schedules of mariners, but the U.S. Coast Guard has made clear that these rules (except for the pilot rest period regulations for U.S. Registered Pilots on the Great Lakes) do not apply to maritime pilots who are not assigned as part of a ship's crew. Nonetheless, these federal rules and international guidance can be instructive references for local efforts aimed at reviewing and improving work rules and guidelines to meet the needs of particular pilotage areas. Key portions of this federal and international guidance are summarized below and the full text of the specific statutes, regulations, and guidance are attached.

1. Crewmembers on Vessels Subject to U.S. Manning Requirements.

- a. Hours of Rest - Each person assigned as an officer in charge of a navigational watch and any rated person forming part of this watch must receive a minimum of 10 hours rest in any 24-hour period. This 10 hour rest period can be divided into no more than two periods, of which one must be at least 6 hours in length. 46 C.F.R. § 15.1111.
- b. Hours of Work - A licensed individual in the deck department may not be required to work more than 8 hours in one day. 46 U.S.C. 8104(d).

2. Crewmembers on Tank Vessels Subject to U.S. Jurisdiction. On a tanker, a licensed crewmember may not be permitted to work more than 15 hours in any 24-hour period, or more than 36 hours in any 72-hour period, except in an emergency or drill. In this context, “work” includes administrative duties associated with the vessel, whether performed onboard the vessel or ashore. 46 U.S.C. 8104(n).

3. Mariners Subject to the STCW Code. Generally, under the International Maritime Organization’s STCW Code’s work and rest requirements, absent overriding operational conditions, officers in charge of a navigational watch and rated crewmembers forming part of the watch must have a minimum of 10 hours of rest in any 24-hour period and 77 hours of rest in any 7-day period. Hours of rest may be divided into no more than two periods, one of which must be at least 6 hours long, and the interval between consecutive periods of rest shall not exceed 14 hours. STCW Code, as amended, Part A, Chapter VIII, Section A-VIII/1.

4. U.S. Registered Pilots Operating on the Great Lakes. U.S. Registered Pilots operating on the Great Lakes, upon completing an assignment at certain designated change points or a series of assignments totaling more than 10 hours with no more than 2 hours rest between assignments, shall not perform pilotage services for at least 10 hours. In the event of an emergency or other compelling circumstance, a Registered Pilot may be assigned for service before his or her 10-hour rest period is completed. 46 C.F.R. § 401.451.

**Crewmembers on Vessels Subject to
United States Manning Requirements**

46 CFR § 15.1111 - Work hours and rest periods.

(a) Each person assigned duty as officer in charge of a navigational or engineering watch, or duty as a rating forming part of a navigational or engineering watch, on board any vessel that operates beyond the Boundary Line shall receive a minimum of 10 hours of rest in any 24-hour period.

(b) The hours of rest required under paragraph (a) of this section may be divided into no more than two periods, of which one must be at least 6 hours in length.

(c) The requirements of paragraphs (a) and (b) of this section need not be maintained in the case of an emergency or drill or in other overriding operational conditions.

(d) The minimum period of 10 hours of rest required under paragraph (a) of this section may be reduced to not less than 6 consecutive hours as long as—

(1) No reduction extends beyond 2 days; and

(2) Not less than 70 hours of rest are provided each 7-day period.

(e) The minimum period of rest required under paragraph (a) of this section may not be devoted to watchkeeping or other duties.

(f) Watchkeeping personnel remain subject to the work-hour limits in 46 U.S.C. 8104 and to the conditions when crew members may be required to work.

(g) The Master shall post watch schedules where they are easily accessible. They must cover each affected member of the crew and must take into account the rest requirements of this section as well as port rotations and changes in the vessel's itinerary.

[CGD 95-062, 62 FR 34539, June 26, 1997, as amended by USCG-2006-24371, 74 FR 11263, Mar. 16, 2009]

46 U.S.C. 8104(d) – Watches.

(d) On a merchant vessel of more than 100 gross tons as measured under section 14502 of this title, or an alternate tonnage measured under section 14302 of this title as prescribed by the Secretary under section 14104 of this title (except a vessel only operating on rivers, harbors, lakes (except the Great Lakes), bays, sounds, bayous, and canals, a fishing, fish tender, or whaling vessel, a fish processing vessel of not more than 5,000 gross tons as measured under section 14502 of this title, or an alternate tonnage measured under section 14302 of this title as prescribed by the Secretary under section 14104 of this title, yacht, or vessel engaged in salvage operations), the licensed individuals, sailors, coal passers, firemen, oilers, and water tenders shall be divided, when at sea, into at least 3 watches, and shall be kept on duty successively to perform ordinary work incident to the operation and management of the vessel. The requirement of this subsection applies to radio officers only when at least 3 radio officers are employed. A licensed individual or seaman in the deck or engine department may not be required to work more than 8 hours in one day.

**Crewmembers on Tank Vessels Under the
Jurisdiction of the United States**

46 U.S.C. 8104(n) – Watches.

(n) On a tanker, a licensed individual or seaman may not be permitted to work more than 15 hours in any 24-hour period, or more than 36 hours in any 72-hour period, except in an emergency or a drill. In this subsection, "work" includes any administrative duties associated with the vessel whether performed on board the vessel or onshore.

Chapter VIII

Standards regarding watchkeeping

Section A-VIII/1

Fitness for duty

- 1 Administrations shall take account of the danger posed by fatigue of seafarers, especially those whose duties involve the safe and secure operation of a ship.
- 2 All persons who are assigned duty as officer in charge of a watch or as a rating forming part of a watch and those whose duties involve designated safety, prevention of pollution and security duties shall be provided with a rest period of not less than:
 - .1 a minimum of 10 hours of rest in any 24-hour period; and
 - .2 77 hours in any 7-day period.
- 3 The hours of rest may be divided into no more than two periods, one of which shall be at least 6 hours in length, and the intervals between consecutive periods of rest shall not exceed 14 hours.
- 4 The requirements for rest periods laid down in paragraphs 2 and 3 need not be maintained in the case of an emergency or in other overriding operational conditions. Musters, fire-fighting and lifeboat drills, and drills prescribed by national laws and regulations and by international instruments, shall be conducted in a manner that minimizes the disturbance of rest periods and does not induce fatigue.
- 5 Administrations shall require that watch schedules be posted where they are easily accessible. The schedules shall be established in a standardized format* in the working language or languages of the ship and in English.
- 6 When a seafarer is on call, such as when a machinery space is unattended, the seafarer shall have an adequate compensatory rest period if the normal period of rest is disturbed by call-outs to work.
- 7 Administrations shall require that records of daily hours of rest of seafarers be maintained in a standardized format,* in the working language or languages of the ship and in English, to allow monitoring and verification of compliance with the provisions of this section. The seafarers shall receive a copy of the records pertaining to them, which shall be endorsed by the master or by a person authorized by the master and by the seafarers.
- 8 Nothing in this section shall be deemed to impair the right of the master of a ship to require a seafarer to perform any hours of work necessary for the immediate safety of the ship, persons on board or cargo, or for the purpose of giving assistance to other ships or persons in distress at sea. Accordingly, the master may suspend the schedule of hours of rest and require a seafarer to perform any hours of work necessary until the normal situation has been restored. As soon as practicable after the normal situation has been restored, the master shall ensure that any seafarers who have performed work in a scheduled rest period are provided with an adequate period of rest.
- 9 Parties may allow exceptions from the required hours of rest in paragraphs 2.2 and 3 above provided that the rest period is not less than 70 hours in any 7-day period.

* The IMO/ILO Guidelines for the development of tables of seafarers' shipboard working arrangements and formats of records of seafarers' hours of work or hours of rest may be used.

Standards of training, certification and watchkeeping for seafarers

STCW CODE

Exceptions from the weekly rest period provided for in paragraph 2.2 shall not be allowed for more than two consecutive weeks. The intervals between two periods of exceptions on board shall not be less than twice the duration of the exception.

The hours of rest provided for in paragraph 2.1 may be divided into no more than three periods, one of which shall be at least 6 hours in length, and neither of the other two periods shall be less than one hour in length. The intervals between consecutive periods of rest shall not exceed 14 hours. Exceptions shall not extend beyond two 24-hour periods in any 7-day period.

Exceptions shall, as far as possible, take into account the guidance regarding prevention of fatigue in section B-VIII/1.

10 Each Administration shall establish, for the purpose of preventing alcohol abuse, a limit of not greater than 0.05% blood alcohol level (BAC) or 0.25 mg/l alcohol in the breath or a quantity of alcohol leading to such alcohol concentration for masters, officers and other seafarers while performing designated safety, security and marine environmental duties.

A

United States Registered Pilots Operating on the Great Lakes

46 CFR § 401.451 - Pilot rest periods.

(a) Except as provided in paragraph (b) of this section:

(1) Each Registered Pilot upon completing an assignment at a change point designated in § 401.450, and

(2) Each Registered Pilot upon completing a series of assignments totaling more than 10 hours with no more than 2 hours rest between assignments, shall not perform pilotage services for at least 10 hours.

(b) In the event of an emergency or other compelling circumstances a pilotage pool may assign a Registered Pilot for service before his 10-hour rest period required under paragraph (a) of this section is completed. Pilotage pools shall advise the Director of each assignment made under this paragraph.

[CGFR 68-57, 33 FR 6479, Apr. 27, 1968. Redesignated and amended at 61 FR 32655, June 25, 1996, and further redesignated and amended by USCG-1998-3976, 63 FR 35139, 35140, June 29, 1998]

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August 30, 2013

Oregon Board of Maritime Pilots
800 NE Oregon Street, Box #15, Suite 507
Portland, Oregon 97232

Re: Fatigue Issues

Dear Board Members:

Along with a letter to you dated May 22, 2013, the Columbia River Pilots (COLRIP) submitted fatigue mitigation standards that are consistent with fatigue-expert recommendations in the report titled Scientific Review: Columbia River Pilots' Watch Schedule (May 3, 2013). In the May 22 letter, COLRIP requested until August 31 to develop a set of proposed operational changes designed to achieve consistency with the approved fatigue standards. The Board granted the request, allowing COLRIP until August 31 to submit an outline of its proposed operational changes, and allowing until January 1, 2014, to implement the transition to new operating practices.

Enclosed is a summary of the proposed changes to COLRIP's operating practices. This summary describes the changes that COLRIP's Rules Committee recommends be made to COLRIP's operations, but the summary is not the full set of rules by which COLRIP would conduct its dispatching and fatigue management program. The provisions described in the enclosed summary are being integrated into COLRIP's very-detailed dispatching rules, and the revised dispatching rules will then be voted on by the membership, as is required by COLRIP's internal organizational procedures. The ballot on revised dispatching rules will be issued and voted during the month of September. If you wish to see the current dispatching rules, they are found in Chapter VI of the COLRIP's Rules and Regulations already on file with the Board.

We will keep you informed as this effort progresses. Thank you for your cooperation as COLRIP makes these major changes to achieve consistency with scientifically approved fatigue mitigation standards.

Very truly yours,



Kevin Q. Davis

KQD:lja
Enclosure
cc (w/encl.): COLRIP

RECOMMENDED OPERATING RULE AMENDMENTS
and
FATIGUE MANAGEMENT RULES

A. DEFINITIONS

1. Pilots. For purposes of these Rules, the term "pilot" may include either regular or trainee members, or both, as the context requires, but does not include apprentices.
2. Away Time. The away time from a dock or berth is the time the last line is let go. The away time from anchor is the time of anchor aweigh. The away time on a vessel that is underway is the time the pilot assumes the conn.
3. Finish Times.
 - a. Vessel Finish Time. Vessel finish time is the end of bridge time, which is the time a pilot disembarks from a vessel, either by boarding a launch or going ashore by means of the gangway or other means provided.
 - b. Duty Finish Time. Duty finish time is the end of duty time, which follows the vessel finish time and, depending on the location, may include time to return to the shore and travel time to Portland.
 - c. Car Ride Finish Time. Car ride finish time is the end of car ride duty time when the car reaches its destination, or a specified time if one is set forth elsewhere in these rules.
 - d. Administrative Finish Time. The finish time for an administrative or office assignment is when the activity is completed, except the finish time for a random drug test is 3 hours after the pilot is called for the test.
4. Set Time. The time a pilot is requested to be aboard and the job is scheduled to begin. Except when boarding an inbound vessel underway in Astoria, a pilot is usually aboard approximately 30 minutes before the set time.
5. Call Job. A job that does not have a set time as of the last dispatching of the day, but expected to occur at night or in the morning before normal dispatching can provide a pilot. A call job is tentatively scheduled at the last dispatching of the day and requires an additional notification (telephone call or other communication) from vessel interests to establish the set time. The set time for call jobs cannot be earlier than the call job time.
6. Standby Time.
 - a. Outside of Astoria. When a call job sets (or cancels) later than the original, tentatively scheduled time, there is "standby time," which is the amount of time between the original, expected time of notice to the pilot for the call job, and either the later

actual notice to the pilot of the set time or the notice of cancellation. Standby time everywhere except Astoria will be tracked for each pilot assigned to a call job for purposes of meeting fatigue standards.

b. Astoria. Pilots are not assigned to call jobs in Astoria until they have a set time, and therefore there is no standby time for delayed call jobs in Astoria. Instead, delay time in setting call jobs will be managed with dispatching rules that limit the accrual of what would otherwise be standby time for pilots to assure that fatigue standards are not exceeded.

7. Bridge Time. For inbound transits, bridge time is measured from the away time (time of assuming the conn) for ships underway in Astoria until the vessel finish time, when the pilot disembarks. For relief pilots on vessels underway, bridge time is measured from the time of assuming the conn until the finish time. For all other jobs, including for pilots relieved while underway, it is the time between the set time and the vessel finish time, plus an additional 30 minutes to account for the time a pilot is aboard the vessel before the set time making preparations to get underway.

8. Duty Time. Duty time includes bridge time as well as the time on task ashore, both before and after bridge time. In addition to bridge time, duty time includes making preparations before a job, traveling to the location where the job commences, time after some jobs end getting from the ship back to the shore, and for jobs ending in Longview or Kalama or Lower River, it includes travel time back to Portland after the job. The time added varies depending on the place the job originates and where it ends. In the following paragraphs, all locations between Tongue Point and Longview are referred to as "Lower River" and treated as a separate port. Duty time associated with car rides is defined separately. Except for car rides, duty time is as follows:

a. Harbor Moves. Vessel moves that begin and end within the same Port, or that are between the Ports of Longview and Kalama, or are between the Ports of Portland and Vancouver. Duty Time for harbor moves is:

Portland/Vancouver to Portland/Vancouver: 1.5 hrs. + Bridge Time

Portland/Vancouver to Portland/Vancouver anchor: 1.5 hrs. + Bridge Time + .5 hrs.

Kalama to Kalama: 2.5 hrs. + Bridge Time + 1.0 hrs.

Kalama to Kalama anchor: 2.5 hrs. + Bridge Time + 1.5 hrs.

Kalama to Longview: 2.5 hrs. + Bridge Time + 1.5 hrs.

Kalama to Longview anchor: 2.5 hrs. + Bridge Time + 2.0 hrs.

Longview to Longview: 2.5 hrs. + Bridge Time + 1.5 hrs.

Longview to Longview anchor: 2.5 hrs. + Bridge Time + 2.0 hrs.

Longview to Kalama: 2.5 hrs. + Bridge Time + 1.0 hrs.

Longview to Kalama anchor: 2.5 hrs. + Bridge Time + 1.5 hrs.

b. Transits. Vessel moves that begin or end in Astoria. Duty time for transits is:

Portland/Vancouver to Astoria: 1.5 hrs. + Bridge Time + .5 hrs.
Longview/Kalama to Astoria: 2.5 hrs. + Bridge Time +.5 hrs.
Lower River to Astoria: 3.5 hrs. + Bridge Time + .5 hrs.
Astoria to Lower River: 1.5 hrs. + Bridge Time + 2.5 hrs.
Astoria to Longview: 1.5 hrs. + Bridge Time + 1.5 hrs.
Astoria to Longview anchor: 1.5 hrs. + Bridge Time + 2.0 hrs.
Astoria to Kalama: 1.5 hrs. + Bridge Time + 1.0 hrs.
Astoria to Kalama anchor: 1.5 hrs. + Bridge Time + 1.5 hrs.
Astoria to Portland/Vancouver: 1.5 hrs. + Bridge Time
Astoria to Portland/Vancouver anchor: 1.5 hrs. + Bridge Time + .5 hrs

c. Interport Moves. Vessel movements between any two of the following: Longview/Kalama, Lower River and Portland/Vancouver. Duty Time for interport moves is:

Portland/Vancouver to Lower River: 1.5 hrs. + Bridge Time + 2.5 hrs.
Portland/Vancouver to Longview: 1.5 hrs. + Bridge Time + 1.5 hrs.
Portland/Vancouver to Longview Anchor: 1.5 hrs. + Bridge Time + 2.0 hrs.
Portland/Vancouver to Kalama: 1.5 hrs. + Bridge Time + 1.0 hrs.
Portland/Vancouver to Kalama Anchor: 1.5 hrs. + Bridge Time + 1.5 hrs.

Longview/Kalama to Lower River: 2.5 hrs. + Bridge Time + 2.5 hrs.
Longview/Kalama to Portland/Vancouver: 2.5 hrs. + Bridge Time
Longview/Kalama to Portland/Vancouver anchor: 2.5 hrs. + Bridge Time +.5 hrs.

Lower River to Longview: 3.5 hrs. + Bridge Time + 1.5 hrs.
Lower River to Longview Anchor: 3.5 hrs. + Bridge Time + 2.0 hrs.
Lower River to Kalama: 3.5 hrs. + Bridge Time + 1.0 hrs.
Lower River to Kalama Anchor: 3.5 hrs. + Bridge Time + 1.5 hrs.
Lower River to Portland/Vancouver: 3.5 hrs. + Bridge Time
Lower River to Portland/Vancouver anchor: 3.5 hrs. + Bridge Time + .5

9. Relief Duty Time. When a relief pilot is assigned to a vessel underway, the duty times for the two pilots are:

For the pilot being relieved on an inbound transit, the same as the duty time for that transit from Astoria to Kalama. For the pilot being relieved on an outbound transit, the same as the duty time for an interport from the place of origin to Kalama.

For the relieving pilot on an inbound transit, it is the same as the duty time for an interport from Kalama to the place of destination. For the relieving pilot on an outbound transit, it is the same as the duty time for a transit from Kalama to Astoria.

When call jobs for transits departing from Kalama or Longview or interports are reassigned to a relief pilot because the pilot assigned to the call job has exceeded the maximum standby time

allowed, the pilot assigned to the call job will have no duty time, and the relief pilot will have duty time calculated as shown above in paragraph 8 for the assignment in question.

10. Car Ride Duty Time. Pilots are often dispatched to Astoria by automobile to provide service to inbound ships. Pilots are also often repositioned (“pulled”) from Astoria to Portland by automobile. The drive times constitute duty time, as does the notice period, which is the period between when a pilot is entitled to receive notice of the car ride and actually commencing the drive time. The notice times for car rides are 30 minutes in Astoria and 2 hours in Portland. The car ride time (including notice period) that is duty time is:

Astoria to Portland: 2.5 hrs.

Portland to Astoria: 4.0 hrs.

Any time that a car ride ends in Astoria within 5 hours of the beginning of a pilot’s duty time for an inbound vessel, some or all of the car ride time is added to the duty time for the inbound vessel assignment for purposes of assessing compliance with fatigue standards. The amount of the car ride time that is added to the vessel duty time depends on the amount of time between the end of the car ride and the beginning of the next vessel duty time:

- 5 hours or more = 0 hours added to next vessel duty time
- 4 to <5 hours = 1.0 hours added to next vessel duty time
- 3 to <4 hours = 1.75 hours added to next vessel duty time
- 2 to <3 hours = 2.5 hours added to next vessel duty time
- 1 to <2 hours = 3.25 hours added to next vessel duty time
- Less than 1 hour = 4.0 hours added to next vessel duty time

Any time that a car ride begins in Astoria within 3 hours of the end of a pilot’s duty time for an outbound vessel, some or all of the car ride time is added to the duty time for the outbound vessel for purposes of assessing compliance with fatigue standards. The amount of the car ride time that is added to the vessel duty time depends on the amount of time between the end of the last duty time for the outbound vessels and the beginning of the car ride time.

- 3 hours or more = 0 hours added to previous vessel duty time
- 2 to <3 hours = 1.0 hours added to previous vessel duty time
- 1 to <2 hours = 1.75 hours added to previous vessel duty time
- Less than 1 hours = 2.5 hours added to previous vessel duty time

11. Duty Time on Assignments Requiring Two Pilots. For vessels requiring two pilots on board simultaneously, both pilots will incur duty time as provided in paragraph 6 above, but the portion of the duty time that is counted as bridge time will be only the time that each has the conn of the vessel. The time when a pilot does not have the conn will be counted as duty time but not bridge time.

12. Circadian Low Period. The circadian low period is the time between and including 0200 and 0559.

B. FATIGUE STANDARDS

1. Pilots must have a minimum of 9.5 hours off duty after any job ending in Astoria (10.0 hours from the vessel finish time) to permit an 8-hour sleep opportunity. Pilots must have a minimum of 12.0 hours off duty after any job ending at any location other than Astoria to permit an 8-hour sleep opportunity. Off duty time starts at the end of the prior duty time. Off duty time ends at the commencement of the next duty time. For purposes of this standard, duty time commences at the time a pilot is entitled to receive notice for his or her next assignment.

2. Bridge time should be limited to 8 consecutive hours.

3. Duty time should be limited to 12 consecutive hours, and no more than 15 duty-time hours in any 24-hour period.

4. Standby time plus duty time should not exceed 15 consecutive hours.

5. Work at night will be planned and dispatched so that a pilot experiences no more than 3 consecutive calendar nights of duty time that infringe in any amount on the circadian low period.

6. Pilot work schedules should not exceed 14 consecutive days on duty.

7. The COLRIP officer on duty may, on a case-by-case basis, authorize departures from these standards if the officer deems it to be in the best interest of safety for a particular vessel or the public.

C. FATIGUE STANDARD DISPATCHING LIMITATIONS

1. Fatigue Standard Compliance Tracking.

Jobs will be planned and dispatched in an effort to limit bridge time to 8 hours. Jobs that unexpectedly exceed this limitation by more than 1.0 hour will be tracked by the office.

Jobs will be planned and dispatched in an effort to limit duty time to no more than 12 consecutive hours, and no more than 15 duty hours in any 24-hour period. Jobs that unexpectedly exceed either of these limitations by more than 1.0 hour will be tracked by the office.

Jobs will be planned and dispatched in an effort to assure that standby time plus duty time does not exceed 15 consecutive hours. Jobs that unexpectedly exceed this limitation by more than 1.0 hour will be tracked by the office.

All tracking of compliance with fatigue standards is for the purpose of future planning and assessing the possible need for changes to dispatching procedures.

2. Work During the Circadian Low Period.

A pilot who has three consecutive calendar nights of duty time that infringe in any amount on the circadian low period will not be eligible for his or her next job until 0600 or after on the next calendar day. A pilot subject to this rule may not be contacted during the circadian low period on the calendar day the pilot is eligible for his or her next job, but may be contacted anytime before 0200 to give notice of an assignment with a set time at 0600 or after, and may be contacted at 0600 or after to give required notice of a later assignment.

3. Automatic Reliefs.

For inbound transits originating in Astoria, relief pilots will be automatically assigned when the transit ends at the following locations:

UGC	301	ITFA	ASHGR
VAN5	302	ITSL	CHEVL
VAN7	303	KINLN	CHEVU
VAN8	304	NU2	CWALL
VAN9	305	SIMPT	DD3
411	312	204	FAMM
603	313	205	GLCR
BP	314	206	IRVIN
			KINWU
			LDC
			PHILO

For outbound transits ending in Astoria, relief pilots will be automatically assigned when the transit originates at the following locations:

301	313
302	314
303	DD3
304	IRVIN
305	CWALL
312	LDC

An automatic relief should be cancelled by the pilot assigned if he or she can reasonably predict that the bridge time for the transit will be 8 hours or less.

Reliefs will not be automatically assigned for jobs to which two pilots are simultaneously assigned, provided that the two pilots divide the piloting work between them so that both have sufficient time off the conn during the job that neither pilot exceeds 8 hours of continuous bridge time. Time off the conn is duty time but not bridge time. If, in planning a two-pilot job, it is

reasonably foreseeable that there will be more than 12 hours of continuous duty time, then relief pilots will be assigned.

Changes to the lists of locations for which automatic reliefs are provided may be made by the President based on bridge time and duty time tracking information. If the President finds that fewer than 50 percent of assignments originating or ending at a location have bridge times greater than 8 hours or duty times greater than 12 hours, the location may be deleted from these lists. If the President finds that 50 percent or more of assignments originating or ending at a location have bridge times greater than 8 hours or duty times greater than 12 hours, the location may be added to these lists. For listed locations, if the President finds that particular vessels or categories of vessels can be reliably predicted to have bridge times that are less than 8 hours, the President may, by written policy, exempt such vessels from the requirement for automatic reliefs.

4. Maximum Standby.

For all call jobs for outbound transits originating from all Longview and Lower River locations, the maximum standby time allowed is 7 hours, after which the job will be reassigned to an available relief pilot. For all call jobs for outbound transits originating from all Kalama locations, the maximum standby time allowed is 6 hours, after which the job will be reassigned to an available relief pilot.

For all call jobs for outbound transits originating from all Vancouver and Portland Lower Harbor locations, the maximum standby time allowed is 6 hours, after which the job will be split with an available relief pilot.

For all call jobs for outbound transits originating from all Portland Upper Harbor locations, the maximum standby time allowed is 5 hours, after which the job will be split with an available relief pilot.

For all call jobs for all interport moves between all ports, the maximum standby time allowed is 7 hours, after which the job will be reassigned to an available relief pilot.

5. Standby Reliefs For Call Jobs.

A standby relief is a pilot who may be needed if the pilot assigned to a call job incurs standby time in excess of the maximum allowed. At the last dispatching of the day the dispatchers will tentatively arrange with the first three pilots remaining on the work board for standby reliefs for interport moves and transits with call job times as follows:

- Transits originating Longview or Lower River: Call jobs before 0300
- Transits originating Kalama: Call jobs before 0400
- Transits originating Vancouver or Portland Lower: Call jobs before 0400
- Transits originating Portland Upper: Call jobs before 0500
- All interports: Call jobs before 0300

Standby relief pilots are not provided for jobs that receive automatic relief pilots.

If notice of set times is received for such call jobs before the maximum standby time is exceeded for the pilot assigned to the call job, no relief pilot will be needed. If notice of the set time is received after the maximum standby time for the assigned pilot is exceeded, then a relief pilot will be needed, and an available standby relief pilot will be dispatched to the relief assignment.

Standby relief pilots for call jobs that might not set until after the maximum permitted standby time will come from the first three eligible pilots remaining in the work rotation after call jobs have been assigned. If there are an insufficient number of eligible pilots remaining in the work rotation, pilots will not be called from time off, the pilot assigned to the call job will retain the assignment even though exceeding the maximum standby time. Standby relief pilots will not be assigned as relief pilots to particular vessels until the jobs set. The first three pilots in the work rotation must be available for dispatching if needed, and will be subject to a penalty for a missed assignment if they are needed and cannot be reached or are not available to accept the assignment.

6. Cancelled Call Jobs.

A pilot assigned to a call job anywhere except Astoria that cancels between 0200 and 0700 (inclusive) or who exceeds maximum standby and has the job reassigned to another pilot will not be eligible to be called for dispatching to his or her next job until 1100 or after.

7. Cancelled Call Jobs in Astoria.

At the last dispatching of the day, ships out of the Astoria anchorage may schedule Astoria call jobs, with set times required within 6 hours of the call job times. If an Astoria call job does not have a set time within 6 hours of the call job time, the call job will be canceled and will next be eligible for a set time the following 0800. If the vessel has a set time within 6 hours of the call job time but is not ready to get underway within 6 hours of the call job time, the job will be cancelled and will next be eligible for a set time the following 0800. Pilots will not be assigned to Astoria call jobs until the job sets with notice given 1.5 hours before the set time in the Astoria anchorage.

8. Relief Location.

Transits to or from Portland or Vancouver that require reliefs will have the reliefs dispatched for Kalama.

9. Time On/Time Off. Pilots with state licenses will work a rotation of 14 scheduled days on duty and 14 scheduled days of time off. Two additional periods of 4 days each period will be scheduled off duty for each pilot for completion of professional training, pilot administration and other work-related activities. All professional training should occur during periods when pilots are on scheduled time out of the work rotation. All scheduled days out of the work rotation are earned time off.

The work rotation consists of a "wheel" with 28 slots. Each slot shall be filled by one or more pilots. Each day at 0800, the pilot or pilots assigned to that day's slot will go on duty from the

time-off board and one or more pilots will leave the work board, going to the bottom of the time-off board. Once on the time-off board, pilots will stay in their relative position until they return on duty. The President shall assign trainees to slots on the wheel and may move them from time to time as necessary to adjust and balance the workload.

10. Last Day on Duty. Time on begins at 0800 on day one and ends at 0800 14 days later. Pilots remain eligible on their last day for assignment to vessels with any of the following set times (based on the 1600 dispatch): Portland/Vancouver, 1800; Kalama/Longview 1900; Astoria Light Ship, 1800; Astoria Anchorage, 1930. Car rides will not be a factor in determining whether one goes to time off during the last day on duty, the only factor will be the set times for vessel assignments. On his or her last day on duty a pilot can be skipped over for a car ride or earlier assignment and remain eligible for another job meeting these set time limits.

11. Working Extra. Due to a lack of rested pilots, a short board or high traffic volumes, the dispatcher may have to call back pilots from the time-off board to work extra. Pilots working extra will be paid for a regular working day for each 24 hours or fraction thereof on duty or for each assignment accepted, with payment made in full at the end of the pay period when earned. Working extra during the first 2 days of regularly scheduled time off will be permitted only if the preceding 14-day work tour was broken by at least 48 continuous hours off duty. Working during the last 2 days of time off will be permitted only if the following 14-day work tour is broken by at least 48 continuous hours off duty. Working during time off is permitted after 48 hours has passed since the last assignment ending the preceding 14-day work tour.

12. Car Rides to Astoria. Pilots will be sent to Astoria by car to cover expected jobs according to the following schedule:

<u>Car</u>		<u>Bar Times</u>		<u>Astoria times*</u>
0900 car	covers	1200-1359	and	1330-1529
1100 car	"	1400-1759	"	1530-1929
1300 car	"	1800-2359	"	1930-0129
1500 car	"	0000-0559	"	0130-0729
1900 car	"	0600-1000	"	0730-1130
0700 car	"	1001-1159	"	1131-1329

*Astoria times include jobs from anchor, port docks or pilot station.

13. Maximum Time in Astoria. A Pilot will be pulled after spending 24 hours in Astoria, but can choose to stay longer (at the pilot's option) if needed to avoid sending a car rider to Astoria. A pilot eligible to be pulled under this rule can be pulled without also pulling those who arrived in Astoria after him. If a pilot has been in Astoria for less than 24 hours, but it is clear to the dispatcher that there will be no job for that pilot within the 24-hour period, then that pilot can be pulled before the 24 hours has elapsed. If a pilot has been assigned to a job scheduled within the 24-hour period, but that job is then delayed beyond the 24-hour period, the

pilot must stay and complete the assignment if it is not possible to dispatch a car rider to arrive in Astoria in time to cover the job. Bar closures and unexpected vessels may cause pilots to remain in Astoria for over 24 hours, if car riders are not available or to avoid vessel delays, in the dispatcher’s discretion.

14. Car Rides from Astoria. Pilots will be pulled from the bottom of the Astoria board and placed at the bottom of the Portland board with the following schedule:

<u>Call Made</u>	<u>Car Ride</u>	<u>Portland Board Time</u>
0930	1000	1200
1130	1200	1400
1330	1400	1600
1530	1600	1800
1730	1800	2000
1930	2000	2200
2130	2200	0000

If Pilots waiting to be pulled leave Astoria prior to the car ride time, they will be required to return to Astoria if the car ride cancels after they depart.

If the duty time provided elsewhere in these rules for a car ride originating in Astoria combined with the duty time for an immediately preceding vessel assignment would exceed a total of 15 duty hours, the pilot should not then drive an automobile returning to Portland, but may ride with others, may take a taxi at COLRIP’s expense, or should remain in Astoria for at least 3 hour’s rest following the end of duty for the preceding vessel assignment. Remaining in Astoria for rest does not change the time the pilot is assumed to have finished in Portland for purposes of dispatching in Portland.

15. 1.5-Hour Notice in Astoria:

1.5 hour’s notice must be provided when ordering a pilot for any job originating from the Astoria port docks or the anchorage. A pilot may request dispatching notice of 1.5 hours or less for such jobs. Required notice for ordering a pilot for a vessel inbound from sea will remain the Buoy #2 inbound time. The amount of dispatching notice requested by a pilot for any job does not alter the duty times established elsewhere in these rules. Notice time for car rides is not affected by this rule and remains half of one hour.

16. Up-River Pilotage. Transits above Ryan Point will be considered as up-river pilotage and billed under tariff provisions as extraordinary pilotage. Only pilots licensed for up-river pilotage will be eligible for up-river assignments. If there are no properly licensed pilots on duty on the Portland board, a licensed pilot from the time-off board, subject to the previously stated limitation on continuous days on duty, can be used and paid as working extra. Pilots eligible for these jobs will be given as much notice as possible.

Two pilots will be dispatched for upriver deliveries of nuclear waste to Hanford and those pilots will split the piloting work 6 hours on/6 off. A relief pilot will be dispatched to arrive in Pasco at least 8 hours before the waste barge and tug are expected to depart from Pasco destined upriver to Hanford. The relief pilot will pilot the tug and barge from Pasco to Hanford. The escort boat that accompanied the tug and barge upriver to Pasco may start back down river from Pasco with the two original pilots on it, piloting all the way back to Portland sharing duty 6 hours on/6 off. After arriving in Portland these two pilots will have an additional 8 hours off duty (plus the otherwise required 12 hours) before being eligible for duty again. The relief pilot will drive back to Portland from Hanford and will not receive the extra 8 hours off duty.

Yachts and other miscellaneous vessels destined upriver of Vancouver will be given a choice: Either two pilots will be dispatched to share piloting duties 6 hours on/6 off, or one pilot will be dispatched who can provide pilotage for no more than 8 continuous hours of bridge time and no more than 15 hours total bridge time in any 24 hour period, with at least one continuous 8-hour rest period. No extra time off duty (other than the required 12 hours) will be given after returning to Portland from duty on a yacht or other miscellaneous upriver vessels.

DRAFT

Discussion of OPA & STCW Federal Standards for Mariners & Pilots Taken from Various Sources

The federal government and specifically the US Coast Guard are careful to state they do NOT regulate pilots. We also must use caution going down the road of requiring pilots to meet "all federal requirements of U.S. licensed mariners."

First, compulsory pilot working conditions are very different than those of embarked crewmembers. Pilots are generally home most nights, sleep in their own bed, can exercise, eat regular meals, etc. Embarked crewmembers on the other hand sleep in bunks on a bouncing ship, conduct ships work, are subject to vessel drills, have the added stress of being away from home, etc.

Second, and probably more important, there really isn't a single federal work/rest requirement that comes with a USCG credential/license. There are hours of rest req'ts for OINCNW on U.S. ships (46 CFR 15.1111), hours of work for deck dept (46 USC 8104), work req'ts for crewmembers on tank vessels (46 USC 8104), and rest requirements for U.S.-registered pilots on the Great Lakes (46 CFR 401.451). There are also work/rest req'ts for licensed mariners operating in the brown water and inland fleets. Problem is, these various requirements that can apply to U.S. licensed mariners conflict in some ways. The STCW requirements, although not applicable to pilots (according to IMO and USCG), can be a useful reference for pilot work/rest req'ts.

Our current ad-hoc version for rest, at its core requirements (e.g., 13 hours work in 24 hours, 10 hours rest, at least 6 hours consecutive rest, etc.) is sound and should withstand scrutiny from NTSB and shows a proactive approach to this issue. We however, must be very cautious about how broadly we define "duties" of a state pilot. For example, some Industry members input draft included "**any of the tasks** necessary to prepare for piloting services." I believe this is overly broad. Does this to cover mundane/routine things like sitting at home repacking pilot bag, talking on the phone with the pilot office, rebooting/downloading updates for PPU, sitting in a cab enroute a job, etc.? Capturing the pilots "work," is tough to do and can often create problems. The Columbia River product applies a time factor much like the Port Staff product does. (This is the only substantive addition to the ad-hoc's product).

Another example of this conflict in play is interestingly with the APA. The APA has concerns that the USCG regs dealing with Great Lakes pilots define "bridge hours" (which impacts both rates and rest issues) too narrowly. The regulation's definition is "number of hours a pilot is **aboard a vessel providing basic pilotage service.**"

I selected "duties" as when a pilot is aboard a vessel providing basic pilotage services, to begin with the Master-Pilot exchange, and add some reasonable period of time (one hour) to allow for admin, transiting to and from the vessel aboard a pilot boat, and any other issue that may crop up. Collaborating with the Pilots indicates this is a fair measure until it is reviewed again. It captures the Corpus Chris pilotage grounds, transit times, etc with the goal of capturing the essence and the stressful/"wear and tear" part of a pilot's day to keep our Port safe.

DRAFT by Port CC Staff

Aransas-Corpus Christi Pilots Work-Rest Requirements

A Pilot's work hours may not exceed 13 total hours in any 24-hour period. After a Pilot has completed 13 total hours of work in any 24-hour period, he or she is required to take 10 consecutive hours of rest. A Pilot who works 13 total hours in the preceding 24-hour period will not be dispatched to a Vessel until the 10-hour rest period has been satisfied. Regardless of the number of hours worked, in any 24-hour period a Pilot must have at least one consecutive 6-hour uninterrupted rest period. A Pilot has the duty to refuse an assignment if the Pilot deems himself or herself insufficiently rested or unfit.

Work is defined as the time a Pilot is performing his or her duties as a State commissioned and licensed pilot. A Pilot's work hours for a Vessel transit of the Corpus Christi Ship Channel ("CCSC") start with the Vessel's first Master-Pilot Exchange ("Start Time"). In other words, all Pilots on board a Vessel will have the same Start Time. A Pilot's work hours for a transit of the CCSC stop one hour after the Pilot steps off the Vessel or when the Pilot's work hours for his or her next transit begin, if earlier ("Stop Time"). Each Pilot will record his or her Start Time and Stop Time for each transit and will report these times to the Aransas-Corpus Christi Pilots Association's dispatcher as soon as practicable following a transit. The dispatcher will log these times into a master logbook for all Pilots. The format of the master logbook will be developed by the Pilots and approved by the Pilot Board, and the Pilots shall provide the Pilot Board with a copy of the completed logbook for each calendar quarter beginning with the fourth quarter of 2014.