

OPINION

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EXCERPTED FROM TESTIMONY ON BEHALF OF OMSA AT A JULY 20 HEARING OF THE HOUSE COAST AND MARITIME TRANSPORTATION SUBCOMMITTEE

It's time to **streamline** the **mariner licensing** process

Over the past several years, we have given our mariners more and more responsibility for safety, environmental stewardship and most recently security. Our industry supports all of these advances. But we must recognize that these new requirements have added to the complexity of the licensing and documentation system. And we have not put in place efficiencies or improvements to address those complexities.

The licensing system was showing signs of this strain long before the hurricanes hit last year, but with those storms, the licensing process has become overstressed to the point of failure.

Today, some Offshore Marine Service Association (OMSA) members have boats tied to the dock because they cannot find qualified crews. The extraordinary delays in licensing and documentation are a large factor.

A survey of OMSA members produced reports that, from the point that the application process is started until the document is received, it may take between three and five months to process an entry-level Merchant Mariner Document or to receive an upgrade in a license. A renewal, which should be a much simpler process, can take from six weeks to four months. If the mariner has a medical condition and needs to seek a medical waiver, the renewal may take nine months to a year. Let me add that as the baby boomer generation ages and the average age of our senior captain increases, medical questions

will become more common.

The negative impact of these types of delays on our industry is hard to calculate. Can you imagine telling an 18 year old to wait up to five months before coming to work? How can we possibly attract the best of the generation that is now entering the workforce with that sort of obstacle? And how do we tell a 30 year employee that he can't go to work because his license has expired?

We think the Coast Guard's plan to fix the licensing and documentation system through a large reorganization is necessary and shows great promise.

In addition, we have three suggestions that we think can help:

First, expand a program called the Streamlined Evaluation Process or SEP. This was started as a pilot project at the Houston REC and has been very successful there. Under the SEP, companies take responsibility for making sure their mariners applications are error free and letter perfect before they are sent to the Coast Guard. The Coast Guard is able to expedite these applications and process them with a minimal amount of delay.

Second, simplify the application itself. The Coast Guard has reported that between 50 percent and 80 percent of all applications that come directly from mariners contain errors or omissions that can slow down the processing.

Third, the Coast Guard should take advantage of the ability to extend licenses and documents that you gave

them as a part of the recently passed Coast Guard Authorization Bill. This would certainly keep mariners from losing the ability to work while their license renewal is being processed, which was the purpose of this change.

Finally, I wanted to touch on the proposed rule for the Transportation Worker Identification Card. We are very concerned about the proposal. According to the proposed rule, mariners would be required to apply for and receive a TWIC before they even begin applying for a Coast Guard document. They would undergo two different background checks, make two applications, pay two fees and endure unnecessary delays. Let's remember that the TWIC program is to be implemented even as the Coast Guard reorganizes and relocates its documentation function to West Virginia. All the warning signs are there that this approach could be disastrous for the American mariner.

We would suggest a couple of approaches aimed at making the system work smoothly.

First, Congress should mandate that mariners should only have to fill out one application form, undergo one background check and pay one reasonable fee.

Second, the implementation of TWIC should be phased in, based on actual risk. Let's remember that our licensed and documented mariners have already undergone a background check that is more complete and more rigorous than the one that would be required under TWIC.