

Gulf Coast Mariners Association



P. O. Box 3589
Houma, LA 70360-3589
TOLL FREE: 1-800-979-GCMA
Phone: (985) 537-4885
Fax: (985) 537-4860

GCMA Report #R-302

Date: April 9, 2002

Subject: A Guide for Investigating for Fatigue

NTSB CHAIRMAN HIGHLIGHTS FATIGUE AS MAJOR CAUSE OF TRANSPORTATION ACCIDENTS

Washington, DC. National Transportation Safety Board (NTSB) Chairman, Marion Blakey today warned that operator fatigue remains a primary cause of serious transportation accidents throughout the United States. "Many times and throughout all modes of transportation, our investigations have found that lost sleep equals lost lives," said Blakey.

The NTSB is highlighting its ongoing concern at the beginning of National Sleep Awareness Week (April 1-7, 2002) to raise public consciousness on the need for vehicle operators to be well rested. Blakey noted that proper sleep is especially critical on our nation's highways. "Each year, highway crashes cause the most transportation-related fatalities," said Blakey. "Of these crashes, recent research shows 100,000 of them involved "drowsy driving" and resulted in 1,500 fatalities."

In other modes of transportation, development of effective fatigue countermeasures has been a perennial priority on the Safety Board's "Most Wanted" list of safety improvements. Analysis of marine vessel casualties cite fatigue as a cause in 16% of accidents. In aviation, the Safety Board recently completed an investigation of an American Airlines crash with 10 fatalities and 105 injuries in Little Rock, Arkansas, where pilot fatigue was a contributing factor. On the nation's rails, fatigue contributed to nearly 20 accidents over the last decade.

A 1999 Safety Board study government efforts to address the fatigue issue found that, despite a number of initiatives, little progress had been made in revising regulations to incorporate the latest research on sleep issues. "We can do more to stem the fatalities, injuries and property damage that result from operators who should be in bed rather than behind the wheel," Blakey said. The NTSB Chairman re-emphasized the Board's recommendations that the Department of Transportation and its modal agencies establish scientifically-

based hours-of-service regulations that reasonably limit duty hours and provide adequate time for rest.

"We are a nation on the move 24 hours a day and this increasingly exposes all of us to the dangers of operator fatigue, not only when we travel but also where we live, work and play," said Blakey. "Combating fatigue is not just a problem for government or for the pilot, ship's officer, train engineer or truck driver, it is the collective responsibility of each and every person who operates a vehicle.

USCG "CREW AWARENESS" STUDIES BIASED TOWARD PROTECTING INDUSTRY PROFITS

[GCMA has written and spoken at length about the abuses of the 12-hour rules that lower-level mariners face. As part of our attempt to focus the Coast Guard on these problems, GCMA sent the following letter to LT Scott Calhoun (G-MSE-1) on December 26, 2001. Less than a month later on January 16, GCMA members Captain Bill Beacom and Richard Block discussed the matter at a TSAC working group meeting at Coast Guard Headquarters. Information LT Calhoun presented in the meeting did not change the views expressed in the letter. However, we are always willing to consider any scientific evidence the Coast Guard may present that validates the "two watch" system. To the date of this report, we have only promises.]

Dear LT Calhoun,

Our Association's concern for the continued exploitation of lower-level mariners and continued abuses of the "12-Hour Rules" (i.e., the two-watch system) presses us to offer these further comments on the Coast Guard's "Crew Endurance Management" project.

We have submitted to your agency, and specifically to RADM Pluta, to Commander Close, and to yourself, copies of our book titled Mariners Speak Out on Violation of the 12-Hour Work Day that contain well over 50 cases where mariners were forced to work more than the legal number of hours simply to hold their jobs and feed their families. Yet, your agency has not taken even the first step to investigate a single one of our allegations.

The Chairman of the National Transportation Safety Board has recommended and urged all modal agencies within the U.S. Department of Transportation to adopt scientifically based work-hour regulations. However, VADM Josiah, Coast Guard Chief of Staff, replied in effect that this could not be done. We disagree.

In regard to working hours, our protests to date have concerned cases where mariners illegally work in excess of 12 hours in a 24-hour period. However, we are also concerned with attempts to fragment and otherwise infringe upon our mariners' off-duty hours.

Specifically, we find it extremely difficult to correlate the

U.S. Coast Guard Guide for the Management of Crew Endurance Risk Factors, Report #CG-D-13-01, Final Report, September 2001 that repeatedly calls for 7 to 8 hours of uninterrupted sleep with your statements and attempts to juggle the existing 6 & 6 watch schedules of river mariners to a 7 & 5/ 5 & 7 hour watch schedule. The Coast Guard report cited above, starting on page 1-1, repeatedly and uncompromisingly states that anything less than 7 to 8 hours of uninterrupted sleep is insufficient sleep duration. The report also emphasizes the necessity for "uninterrupted sleep." Further, the report does not even consider the two-watch system as being a viable alternative to a three-watch system or any other system under consideration.

We do not believe that a 7 & 5 followed by a 5 & 7 hour watch schedule allows for a full 7 to 8 hours of uninterrupted sleep. In addition, the irregularity of the schedule itself tends to be disruptive.

Report #CG-D-13-01 was designed to remedy problems with the Coast Guard's own personnel. These problems came into plain view, especially to Congress as a result of the S/V MORNING DEW accident in 1997 where, among other things, one key Coast Guard watchstander on 24-hour duty was asleep at the time of the incident and another was insufficiently trained to act responsibly. Of course, the \$19,000,000 settlement against the Coast Guard served to emphasize the point.

Since GCMA's visit to Capitol Hill last September both before and after the MERPAC/TSAC meeting, many Congressmen and Senators now know "up close and personal" about our mariners' problems with abuses of the 12-hour rule.

Well, LT Calhoun, lower-level mariners are human beings, too. They have to have their sleep and a little leeway when they can't get to sleep aboard ship for any number of understandable reasons. They need to be well-rested when they join the vessel. They cannot afford to stand two consecutive watches during certain types of crew changes which are only two of the problems faced by undermanned vessels.

The existing two-watch system, extended over a period of time, stretches "crew endurance." Eating, bathing, and simply relaxing slashes 7 to an easily predictable 6 hours and 5 to 4 hours that falls far short of the 7 to 8 hours Report #CG-D-13-01 calls for. And, the sleep deficit only builds up as time passes.

The two trade associations that you appear to cater to, namely the American Waterways Operators (AWO) and the

Offshore Marine Services Association (OMSA) are the organizations whose members profit from the exploitation of lower-level mariners. AWO deals primarily with uninspected vessels while OMSA deals primarily (but not exclusively) with inspected vessels. As for the offshore oil industry, the manning levels have been reduced so low that personnel seldom if ever have the opportunity to gain adequate sleep. The Coast Guard and the vessel owners (and their trade association) are responsible for setting appropriate manning levels. Many OSVs do not even post meaningful watch schedules because undermanning makes their work schedules hopelessly irregular. Mariners do not even enter into the picture of setting manning levels. [Refer to GCMA Report #R-279.]

Even though you may have seen people happy or even delighted with 7 & 5 / 5 & 7 watches as opposed to 6 & 6 watches, I hope you realize that you were dealing with a captive audience working with full crews for reputable companies. In your letter, you stated that: "We are continuing to learn more about the industry and we feel this is an excellent opportunity." To the contrary, by ignoring the real mariners ô as when you ignore us ô you are simply allowing yourself to be flattered and conned by the experts. I suggest you read our book and our reports to learn about the lives of lower-level mariners and then act both appropriately and responsibly. Very truly yours, s/Richard A. Block, Secretary/GCMA

INVESTIGATING FATIGUE

The Transportation Safety Board of Canada prepared a Guide for Investigating for Fatigue in 1997. Such investigations and inquiries increasingly follow transportation accidents of all kinds including trucks, boat, automobiles, railroads and airplanes. This report discusses how to investigate for fatigue and discusses the relationship between sleep ad fatigue. The following report is meant for study rather than casual reading. Readers should review each "bullet" listed in Section 2.0 slowly and carefully. A glossary of common terms appears in the closing pages of the report. GCMA has other literature available to members on the study of fatigue that we use to develop our positions in our appearances before various Federal advisory committees on behalf of lower-level mariners.