

July 27, 2020

Mr. Larry McNutt, Jr.  
Administrator  
Louisiana Pilotage Fee Commission  
Two United Plaza, Suite 702  
Baton Rouge, LA 70809

Re: Louisiana Pilotage Fee Commission Docket No. P20-001

Dear Mr. McNutt:

On behalf of the members of Cruise Lines International Association (CLIA), we are writing to express concern with and opposition to the Crescent River Port Pilots' Association's (CRPPA) recently filed request for increased compensation in Docket No. P20-001. CRPPA states it is seeking a proposed increase in the current annual average compensation per pilot from the \$526,958 paid in 2019 to a recommended annual amount of \$697,000.

The COVID-19 pandemic has created for cruise lines the most significant operational challenge in the history of the cruise industry. The U.S. Center for Disease Control and Prevention has extended its No Sail Order for cruise ships through September 30, 2020, which suspends passenger operations on cruise ships with the capacity to carry at least 250 passengers while sailing itineraries subject to U.S. jurisdiction. In March, prior to the CDC's No Sail Order, CLIA member lines voluntarily suspended their operations. Now, considering the CDC's No Sail Order through September 2020, CLIA forecasts the suspension of cruise operations will result in a nearly \$25 billion economic loss to the U.S. economy and a reduction of 164,000 U.S. jobs.

Given the current economic conditions in the U.S., including an unemployment rate of 11.1 percent and unprecedented economic strain impacting a broad spectrum of businesses, all resulting from the COVID-19 pandemic, CRPPA's pursuit of such a significant increase in Pilot compensation is both untimely and unreasonable as it disregards the present economic realities of the shipping industry. It should be further noted, that when the cruise industry resumes operations, CLIA's member lines will be operating with fewer passengers, thereby generating lower revenues per cruise. The proposed increase in Pilot fees will have a severe and adverse impact on the timely recovery of the cruise industry, which pre-COVID-19 was generating annually \$477 million in direct spending in Louisiana and supporting nearly 9,000 jobs—including CRPPA members.

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Established in 1975, CLIA, is the world's largest cruise industry trade association, representing 95 percent of the cruise industry passenger capacity. On behalf of its ocean cruise line members, CLIA provides a unified voice in supporting policies and procedures that foster a safe, secure, and sustainable cruise ship business designed to promote the cruise travel experience. CLIA member lines acknowledge and respect the vital role that port pilots play in facilitating that safe, secure, and sustainable cruise travel experience. However, the current situation in the shipping industry requires all participants in the industry to work together to equally shoulder the burden for returning to a more prosperous time.

Thank you for your consideration of these comments and working through this important issue in a cooperative manner.

Sincerely,

*Bradley M. Rose*

Bradley M. Rose  
Associate General Counsel