Hon. Pete Buttigieg - [dotexecsec@dot.gov](mailto:dotexecsec@dot.gov)

Secretary of Transportation

US Department of Transportation, Office of the Secretary

1200 New Jersey Ave, SE

Washington, DC 20590

Hon. Polly Trottenberg - [polly.trottenberg@dot.gov](mailto:polly.trottenberg@dot.gov)

Deputy Secretary of Transportation

Office of the Secretary of Transportation

1200 New Jersey Ave, SE

Washington, DC 20590

Ms. Lucinda Lessley - [lucinda.lessley@dot.gov](mailto:lucinda.lessley@dot.gov)

Acting Administrator, U.S. Maritime Administration

U.S. Department of Transportation Maritime Administration  
West Building

1200 New Jersey Avenue, SE

Washington DC, 20590

Hon. Thomas Suozzi

c/o Diane Shust, Chief of Staff - [Diane.Shust@mail.house.gov](mailto:Diane.Shust@mail.house.gov)

Chair, U.S. Merchant Marine Academy Board of Visitors

407 Cannon House Office Building

Washington, D.C. 20515

VADM Joachim “Jack” Buono - [Buonoj@usmma.edu](mailto:Buonoj@usmma.edu)

U.S. Merchant Marine Academy

300 Steamboat Road

Kings Point, NY 11024

Dear Secretary Buttigieg, Deputy Secretary Trottenberg, Acting Administrator Lessley, and Representative Suozzi:

Since receiving the Maritime Administration’s letter dated December 16, 2021, I have been excited and hopeful that commercial Sea Year would return to normal operation and I would be able to acquire the mission critical shipboard experience necessary to graduate, obtain my unlimited tonnage license, and qualify to serve as a U.S. Navy Strategic Sealift Officer. Unfortunately, that has not been the case.

I understand that U.S.-flag vessel commercial carriers, despite good faith efforts, have been unable to comply immediately with all of the requirements required by the new EMBARC program and thus cannot embark USMMA cadets. Those new standards were issued on December 15, 2021, so perhaps it was unrealistic to expect that within a few short months a carrier would complete the thirty-nine (39) immediate actions required by EMBARC, and also commit to complete physical modifications to their vessels and five (5) other actions within one year, implement an overhauled annual training within eighteen months, and develop a SASH perpetrator information exchange within two years.

Yet the Maritime Administration does not require satisfaction of the EMBARC standards by commercial carriers prior to embarking cadets from the six state maritime academies (SMAs). As a result, SMA cadets—who have significantly more limited training requirements than USMMA cadets—have filled the berths normally filled by USMMA cadets like me. If SMA cadets are able to embark, it seems that the current shipboard environment is also secure enough for USMMA cadets.

Not only is the current situation unfair and incomprehensible, but it appears to threaten the government’s efforts to ensure recruitment, training, and retention of sufficient service-obligated merchant mariners for sustained strategic sealift. I am asking that the Department of Transportation and the Maritime Administration consider a phased approach to implementing EMBARC in which commercial carriers that are currently embarking SMA cadets and/or were embarking USMMA cadets before the suspension of Sea Year last November are permitted to make training berths available to USMMA cadets like me. This would enable USMMA midshipmen to resume the intensive training that will enable us to serve our country at the level of proficiency expected of Strategic Sealift Officers instead of spending an artificially inflated number of days on vessels ill-suited to offer us the hands-on experience deemed necessary by the Coast Guard and MarAd itself.

Additionally, I understand that Secretary Buttigieg has the ultimate authority to provide for training of USMMA and SMA cadets. 46 U.S.C. §§ 51103(a), 51301(a). I also understand the Secretary Buttigieg has the authority:

* to waive active service requirements from USMMA cadet commitment agreements due to hardship in completing training or otherwise, 46 U.S.C. § 51306(b)(1), (c)(1);
* to waive active service requirements for SMA cadets receiving incentive payments due to hardship in completing training or otherwise, 46 U.S.C. § 51509(e); and
* to impose “alternative service requirements” in satisfaction of USMMA or SMA cadet training and service requirements, 46 U.S.C. §§ 51306(e)(2), 51509(h)(2).

Given the Secretary’s established authority to grant waivers, I am, by way of this letter, formally requesting that Secretary Buttigieg grant me a waiver to train onboard commercial vessels approved to carry USMMA cadets prior to November 1, 2021, so that I can complete the onboard commercial training that I have always intended to complete and considered mandatory until this year. I am not requesting – and definitely do not want – a waiver from my training requirements or active service commitments. I understand and expect that any commercial vessel that embarks me will provide me the same SASH protections and resources as those that are provided to SMA cadets sailing aboard commercial vessels. I also expect that the USMMA will provide the new services and supports detailed in the December 16, 2021 letter, including: a satellite phone for my use while at sea, trained support personnel at USMMA that I can contact if and as needed, and the amnesty policy for SASH survivors, intervening bystanders, and witnesses.

For class of 2023, use the following paragraph:

Please respond to my request for a waiver no later than [fill in specific date that is 10 days from date of waiver request] so that I can obtain meaningful training aboard a commercial vessel prior to the conclusion of my Sea Year training in June.”

For class of 2024, use the following paragraph:

Please respond to my request for a waiver no later than [fill in specific date that is 10 days from date of waiver request] so that I can obtain meaningful training aboard a commercial vessel before the current Sea Term ends in June.

Please respect my commitment to my country, my maritime career, and my training and grant this request.

Respectfully,

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Signature

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Full Name (Printed)

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Class Year