



Unforgettable journeys.

June 20, 2016

Federal Communications Commission
445 12th Street, S W
Washington, DC 20554

Re: WT Docket No. 16-162

US Coast Guard Request for Waiver to Permit Use of Class D VHF Digital Selective
Calling Equipment in Lieu of Class A Equipment

Ladies and Gentlemen:

Thank you for this opportunity to comment. I own and operate 12 small passenger vessels inspected under Title 46, Subchapter T and K by the US Coast Guard, part of Chesapeake Marine Tours, Inc DBA Watermark in Annapolis and Baltimore, Maryland. I support the Coast Guard's request to allow a blanket waiver for domestic passenger and small passenger vessels to carry Class D VHF Digital Selective Calling (DSC) equipment in lieu of Class A Equipment. Class D equipment is more appropriate to my smaller domestic operation, which operates primarily cruises under 90-minutes in duration, while providing the same basic capabilities and interoperability with the Coast Guard's Rescue 21 system as Class A equipment. Your May 19, 2016 notice states that the Class A equipment is "intended for ocean-going ships to meet the Global Maritime Distress and Safety System (GMDSS) requirements..." As a U.S. flagged small passenger vessel operating on domestic-only routes, my vessels are not subject to GMDSS requirements and should have never been required to carry Class A equipment.

The FCC has a waiver process allowing for the use of Class D VHF DSC equipment, but I would need to apply for the waiver and pay a \$195 fee. This is an undue burden that should not be required of my small business. In Executive Order 13563, dated January 18, 2011, the President stated that one principle of federal regulation is to use the "least burdensome tools for achieving regulatory ends" and directed each agency to "tailor its regulations to impose the least burden on society, consistent with obtaining regulatory objectives, taking into account ... the costs of cumulative regulations." In Executive Order 13579, dated July 11, 2011, the

President directed that "to the extent permitted by law, independent regulatory agencies should comply with these provisions as well." FCC approval of the Coast Guard's blanket waiver application is a perfect opportunity to comply with these Executive Orders as it will relieve me and other small business entities from the unnecessary burden of having to apply for an individual waiver and to incur the associated \$195 filing fee.

Thank you for your consideration of my comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Debbie H. Gosselin", with a long horizontal flourish extending to the right.

Debbie H. Gosselin
President