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FEDERAL COMMUNICATIONS COMMISSION
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U.S. Merchant Marine Academy
Steamboat Road
Kings Point, New York 11024

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MAIL BRANCH

October. 30, 1992

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

To Whom It May Concern:

I am submitting these comments as allowed by the Notice of Proposed Rule Making (FO Docket No. 92-206), adopted August 21, 1992, which concerned the privatization of the administration of examinations for commercial radio operator licenses.

I strongly suggest that the Federal Communications Commission emulate as far as possible the U.S. Coast Guard with regards to the authorization of external agencies (both governmental and private sector) to act as examiners of certain required areas of competency. The USCG has an excellent system in place which allows Merchant Marine License candidates to obtain certifications (i.e., radar observer and fire-fighting) which may be required by a particular license through the private sector. In the case where the license candidate is attending a state maritime college or the U.S. Merchant Marine Academy, the school is authorized to provide the certification. A careful analysis of the Coast Guard's system should be one of the FCC's highest priorities.

The U.S. Merchant Marine Academy has already been authorized by the FCC to administer the Marine Radio Operator Permit Examination to our midshipmen. We have put together a syllabus for a GMDSS course and hope to be able to certify our midshipmen in that subject. Pending approval by the FCC of our facilities, GMDSS Curriculum, and instructors, the Academy intends being among the first organizations to administer a GMDSS License Examination once the GMDSS Radio Operator's License becomes available.

Very Respectfully,



Paul Zerafa
Associate Professor, Department of Marine Transportation

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