



Office of the Secretary
Federal Communications Commission
Washington, DC 20554
reference CI Docket 95-55

FCC MAIL ROOM

JUN 21 1995

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Dear sirs:

In response to your letter dated June 9, 1995 about privatization of radio inspections I have some comments and concerns.

1. Cost - right now the fee of \$380.00 is ridiculous! The radio inspection of a small passenger vessel take approximately 10 minutes to do by a qualified inspector on a maintained radio system. That translates into \$ 2,280 an hour. Even if the inspector spent an hour on the inspection \$ 380.00 an hour is still way too much. This was a free service until recent and instead of being reasonable and making the fee \$ 20 - 50 the FCC made it \$ 340 and then raised it more!

If you turn it to the private sector you need to make it so prices will be competitive so small businesses do not get taken by the precedent that the FCC has now set with their outrageous fee for these simple inspections. You must have many companies do inspections and keep the cost down. A \$50 fee for this would be reasonable.

Please think about the private sector and the small businesses when making decisions such as cost.

2. I suggest that instead of doing radio inspections you instead do a training course and certify individuals who install and maintain radios. Then small businesses can have an employee certified on proper installation of radio and antennas and you would do away with the need for any inspections as long as the company could show that they have a certified individual who maintains their radios. Then you would only need to inspect those who did not have certified radio installers and maintainers.

The individual could be the companies mechanic, captain or the owner of the vessel.

3. No random inspections please. It becomes a hardship to the tour and could cause delay of the charters. Especially if the inspections are done by private company looking to make extra money. Announced inspections free of charge with short time periods would be acceptable if you feel you must.

4. I do not believe the inspections has helped with safety under the current system so I do not believe safety will be affected by going private. What does affect safety is overburdening of the small businesses with a bunch of fees by the government so that the small business is unable to afford to update equipment. For example we pay FCC \$380 for inspection every 5 years, FCC \$35.00 for

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station license every 5 years, FCC \$35.00 every 5 years for captain renewals, U.S. Coast guard \$550 a year for inspections, state 2% of our gross along with the normal business expenses such as taxes, insurance, rents, wages, health insurance, workmans comp ect. SO you can see that the last thing small business need is to pay someone \$380 to look at a radio that is built commercially under FCC requirements and be told that it is ok. Maybe you should make the inspection free and then charge \$380 to those whose systems are not working correctly.

5. If you go private you must consider what will happen to those in remote areas. Will the private companies go there such as the individual islands of Hawaii? Are the small businesses in the remote areas going to be hit with a big surcharge because they are far away?

Thank you and if you would like to reply back or have questions I can be reached at 808 826-7197. My e-mail is captain@aloha.net on the internet. My fax is 808 826-7704.

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Respectfully,

Ted Myers