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13 July 1995

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VICTORIA, B.C.

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Dear Sir or Madam:

SEATTLE

I am writing in response to the Notice of Proposed Rulemaking, CI docket No. 95-54.

SUNSET CRUISES

While I am strongly in support of the privatization of the marine radio inspection process, I do not agree with the use of only Classification Societies for this inspection. Authorization of a licensed first call radio technician to perform this inspection would utilize a system that is already currently in place, with these technicians currently performing "pre-inspections" in compliance with all FCC regulations before the Inspector arrives on the vessel. A classification society, on the other hand, would be a new element to most of our sector of the industry, who's vessels are generally not classed.

SAN JUAN ISLANDS

As a member of the Passenger Vessel Association, I strongly urge you to review the position of our association, which supports the authorization of FCC licensed first class radio technicians to perform inspections under the Great Lakes Agreement, the Communications Act of 1934, and SOLAS 92.

CRUISE EXCURSIONS

Thank you for your attention In this matter.

Yours truly,

TULIP FEST TOURS

Darrell E. Bryan
Vice President and General Manager

DB/bg

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THE GREAT LAKES TOWING COMPANY ®

1800 TERMINAL TOWER
50 PUBLIC SQUARE
CLEVELAND, OHIO 44113-2274

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July 17, 1995

95-54

Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

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RE: NOTICE OF PROPOSED RULE MAKING

Gentlemen:

By way of background, The Great Lakes Towing Company, celebrating our 96th year in the towing business, has operated tugboats specifically designed for harbor towing, 50 of which are operated on all five of the U.S. Great Lakes and St. Lawrence Seaway and service over 35 ports. We would like to comment on the proposed rule in which the Federal Communications Commission may permit an inspection of the Great Lakes Agreement Certificate to be renewed by a Private Sector. We recognize the Classification Society, however, the American Bureau of Shipping specializes in engineering, general shipping construction, hull and machinery surveys. We feel that there are other suitable private sectors, including The Great Lakes Towing Shipyard, which would be able to perform current required inspections for vessels subject to the Great Lakes Agreement not only for The Great Lakes Towing Company fleet, but in addition, the customers that call upon our Shipyard for services.

We would appreciate the receipt of "Reply Comments", and will pay for any postage due.

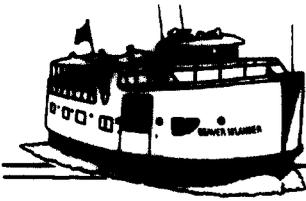
Sincerely,

Mark A. Hall
Vice President, Operations

MAH/auk

cc: George R. Dillon, Engineering Advisor

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BEAVER ISLAND BOAT CO.

102 Bridge Street
Charlevoix, MI 49720
(616) 547-2311

Executive Offices:
Box 148
Beaver Island
St. James, MI 49782

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FCC MAIL ROOM July 13, 1995

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

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Re: CI docket No. 95-54, NPRM, Great Lakes Agreement and
CI docket NO. 95-55, Notice of Inquiry, Privatization of
marine radio inspections

Beaver Island Boat Company operates a ferry service with
three ferries, from Charlevoix, Michigan to Beaver Island in
northern Lake Michigan.

My first comment is that the Great Lakes Agreement is very
much out dated. All commercial vessels have sophisticated,
modern communication and navigational equipment to make ferry
transportation in the United States and Canada exceptionally
safe. I do not know when the Great Lakes Agreement was made,
but I know they could not have taken our modern technology
into consideration. The agreement might have served its
purpose then, but I believe it is over due for a re-
evaluation.

I propose that the inspection of marine radio installations
totally be dropped. They serve no purpose whatever. At a
recent meeting with a guest speaker from the regional FCC
inspection office, I asked how many discrepancies were found
in the most recent years annual inspections. The answer was
"NONE". This is a very good indication that the inspections
are a waste of time and money... for the FCC as well as the
licensed operators. If an inspection has to be made, allow
the FCC licensed first class radio technician to make it...
he is the one already checking our radios on a regular basis.
It would not cost the operator or FCC any extra time or money
and therefore should not require any fees or permits.

If anyone needs to be inspected, it would be the recreational
boater. They are the ones with improper procedures, use of
wrong frequencies, and equipment that is not properly
maintained. At times, they make it difficult for a
commercial vessel to maintain an appropriate radio watch...
their improper use of channel 16 causes an operator to "tune
out" the excessive noise.

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Office of the Secretary, FCC

I hope that the government's efforts to reduce un-necessary regulation will prevail in this case. If the inspections are dropped, the loss of income from FCC inspection fees would be easily offset by savings from a reduction in FCC inspectors. I look forward to a real improvement in the whole process.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynn DeGrow".

Lynn DeGrow
President