



July 18, 1995

The Honorable William F. Caton
Office of the Secretary
Federal Communications Commission
Washington, DC 20554

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FCC MAIL ROOM

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Washington, DC 20005
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FAX (202) 546-2121

Dear Mr. Caton,

DOCKET FILE COPY ORIGINAL

Jeffrey C. Smith
Executive Director

Capt. Ken Beard
Destin Charter Boat Assn
Chairman

Gary Fagan
United Boatmen of NJ & NY
Vice Chairman

Capt. Joe McTomoney
Cape May (NJ) Charter Boat Assn
Secretary/Treasurer

Member Associations

Atlantic Cnty (NJ) Party & Chrtbt Assn
Black River (NY) Charter Guides Assn
Cape Cod (MA) Charterboat Assn*
Cape May (NJ) Charter Boat Assn*
Captree (NY) Boatman Open & Charter Boats
Central Basin (OH) Charterboat Assn
Charterboat Assn of Puget Sound (WA)
Chicago (IL) Sportfishing Assn*
Connecticut Sportfishing Alliance
Deep Creek (AK) Charter Boat Assn
Destin (FL) Charter Boat Assn*
Eastern Lake Erie (NY) Charterboat Assn
Fishing Charters of Marco (FL)
Genesee (NY) Charter Assn
Golden Gate (CA) Fisherman's Assn
Greater Point Pleasant (NJ) Charter Assn
Homer (AK) Charter Assn
Ilwaco (WA) Charter Assn
Indiana's N. Coast Charter Assn
Kenosha (WI) Charterboat Assn
Lake Champlain Charter Fishing Assn
Lake Erie (OH) Charter Boat Assn*
Lake Ontario (NY) Charter Boat Assn
Ludington (MI) Area Charterboat Assn
Marathon (FL) Guides Assn
Maryland Charterboat Assn*
Michigan Charter Boat Assn*
Michigan City (IN) Charterboat Assn*
Midwest (IL) Charter Assn
Mississippi Charter Boat Captains Assn
N. California Assn of River Guides
NE (MA) Charter Boat Captains Assn.*
Niagara Cnty (NY) Charter Fishing Assn
North Coast (OH) Charter Boat Assn
North Fork (NY) Captains Assn
Oregon Coast (OR) Charterboat Assn
Panama City (FL) Boatmen Assn*
Petersburg (AK) Charterboat Assn
Pleasure Island (NC) Fisherman's Assn
Port Aransas (TX) Boatmen, Inc.*
Port of Conneaut (OH) Charter Boat Assn
Professional Capt.'s United of NY
Sandusky (OH) Charter Boat Assn
Sandy Pond-Pulaski (NY) Chrtbt Assn
Sitka (AK) Charter Boat Operators Assn*
Stikine (AK) River Jet Boat Assn
United Boatmen of NJ & NY*
Valdez (AK) Charterboat Assn
Virginia Charter Boat Assn*
Waukegan (IL) Charterboat Assn
Western Connecticut Captains Assn

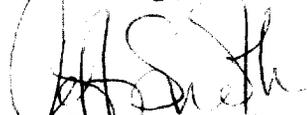
I am writing to you today on behalf of the National Association of Charterboat Operators (NACO) to respond to the Notice of Inquiry to review the Commission's rules regarding the inspection of ships for compliance with the Communications Act of 1934 and the International Convention for Safety of Life at Sea, 1974 (CI Docket No. 95-54).

NACO is a 4,100 member association for the charterboat industry. Our members include small inspected passenger vessels, which are directly affected by this notice.

NACO strongly supports any efforts on behalf of the FCC to develop alternative means of inspection that would simplify and streamline the inspection process. Of particular interest to our members is the proposal to investigate a strategy to utilize private sector entities to perform inspections. However, NACO opposes restricting private sector participation exclusively to classification societies, which would effectively exclude the small passenger industry from the benefits of this rulemaking.

If you have questions or need additional information, please do not hesitate to call me, (202)546-6993. Thank you for your consideration of our association's views

Sincerely,


Jeffrey C. Smith
Executive Director

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*Member, NACO Board of Directors