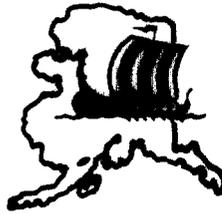


ICICLE SEAFOODS, INC.

P.O. BOX 79003
SEATTLE, WASHINGTON 98119



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JUL 18 1995

FCC

July 14, 1995

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

RE: CI Docket 95-55

Sirs:

This letter is a comment concerning the inspection of large cargo vessels. The comments are listed in the order of the questions asked on your Notice of Inquiry of June 16, 1995.

1. The Commission should allow certain private service companies as well as classification societies to conduct inspections. The reasons that private service companies should be allowed to conduct inspections are three-fold. First, these electronics service companies are technically proficient. They are the ones performing installations and repairs and have intimate knowledge of the systems. Our Company has a pre-inspection service performed by a contractor each time an inspection is scheduled and, in every case, the inspection is easily passed.

Secondly, I believe that private sector competition will serve to keep the costs in check while still providing quality service. If permission for inspections was restricted to classification societies, the costs to maintain a current certificate could double or triple. Experience has shown that the American Bureau of Shipping, for example, will typically charge a high hourly rate, add travel time, air fare and per diem as applicable. An inspection in the field in Alaska could cost up to several thousand dollars. Meanwhile, there are qualified electronics contractors in Dutch Harbor and elsewhere that could otherwise do the same inspections if given approval.

Another reason to use private contractors is to expedite and simplify any service work or repairs needed. The technician/inspector would be able to have the flexibility to repair the equipment on the spot if it was minor, schedule it for another time when parts were available and continue the inspection at that time, or any other of many possible scenarios. A customer would not be limited to a very narrow time slot for an inspection in the field with a dozen other vessels all vying for the same service during the same field visit by an inspector. Vessel inspections in the field could be scheduled much like they are currently in a larger port where FCC can schedule with much less lead time.

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July 14, 1995

Page 2 of 2

2. The criteria used to qualify a private sector entity for conducting inspections on the behalf of FCC should be designated by FCC. Surely, the technical ability should be present at FCC to establish requirements for a certain individual working for an electronics contractor to qualify as an inspector. An annual renewal exam and fee structure should help to eliminate those not so serious or dedicated. The criteria used should be technical in nature, but practical. Other factor such as the size or financial status of the company should not be considered in certifying the quality and integrity of the inspector. Of course, the reporting of inspection results to FCC would need to be coordinated and monitored closely. Substantial penalties could be established as a deterrent for private inspectors who perform substandard work.
3. The Commission should absolutely oversee the entire inspection process. That is the best way to ensure that uniformity and quality standards are being met. This can be done by random checks in the field and by review and monitoring of the inspection reports. In fact, the Commission should retain the function of certificate issuance after submittal of the proper inspection reports by the inspecting entity. Also needed is a method for customers to provide the Commission with feedback on the inspection process and the inspectors.
4. Random inspections would be a good tool to help cut the inspection costs associated with annual certification assuming the Commission actually delegates authority to the private sector to conduct inspections. If that does not occur, then the current policy of regular, annual inspections for a fixed fee should remain.
5. Safety should not be compromised by the privatization of the inspection process at all, but strictly depends upon the ability of the Commission to provide a comprehensive, logical method of transferring the inspection function to other parties as well as efficient, continued monitoring of the program. FCC itself will determine the success or failure of this proposed move by the manner in which it is accomplished and the simplicity of the end result. Procedures and forms need to be clear and concise. Communication of all aspects of the changes and subsequent procedures needs to be properly and widely distributed.

Respectfully,

ICICLE SEAFOODS, INC.

Thomas L. Swanson

Thomas L. Swanson
Fleet Maintenance Manager

TLS/sep

Federal Communications Commission Washington, DC 20554

re: CI Docket 95-55

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Mon, Jul 10, 1995

JUL 10 1995

FCC MAIL ROOM

Aloha:

Regarding your Notice of Inquiry:

1. We should probably NOT only permit the use of a classification society to conduct inspections.
2. For authority to conduct ship inspections, a member of the private sector should have no connection with any political entity and have experience in marine radios.
3. The Commission should remain in an oversight role for the inspection process.
4. The FCC should conduct random inspections.
5. There should be no effect on safety with privatization as long as the entity awarded the contract has no connection with a government agency or politician.

A question. What can be done about operators continually leaving their microphones open on a channel?

Mahalo,


Warren d'Aquin, President

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DEEP SEA FISHING ON THE
SHAMROCK
48' • 6 TO 14 PASSENGERS

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JUL 18 1995

FCC MAIL ROOM



07-16-95

FEDERAL COMMUNICATION COMMISSION
Attn: OFFICE OF THE SECRETARY
REF: CI DOCKET 95-55
WASHINGTON, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Sirs,

Re: Letter of 06-16-95 (Radio License Inspection privatization)

1. Should we only permit the use of a classification society to conduct inspections?

No! Let qualified local individuals licensed for transmitting and receiving equipment be authorized to do routine inspections as a part of their services.

2. What criteria, if any, should we use to authorize a private sector entity to inspect ships on behalf of the commission?

Use current criteria for FCC accepted licensees plus application and acceptance for an inspection facility. Local repair personnel know local boats and can monitor locally far better than a regional inspector.

3. Should the commission be involved in an oversight role in the inspection process?

Yes, through licensing of inspection facilities and monitoring of airwaves as is currently done.

4. Should we conduct random inspections?

Only if a violation occurs, and the monitoring station perceives inspection is warranted.

5. To what extent, if any, will privatization effect safety?

Local inspection plus FCC monitoring should improve safety by assuring more frequent observation of equipment being repaired and utilized on local vessels.

The combination of local inspection facilities and the regular USCG random and scheduled inspections (uninspected and inspected vessels) should decrease illegal operators and provide legal operators convenient access to improved maintenance and inspection.

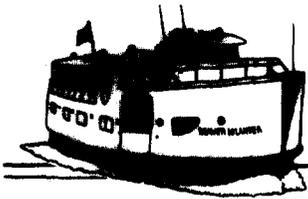
Sincerely,

Capt. Eugene K. Itzen

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CUSTOM EXCURSIONS, FISHING AND LIGHT TOWING

CAPTAIN'S GENE & BILLIE ITZEN • 196 W. FRANKLIN • ASTORIA, OR 97103 • (503) 325-5797



BEAVER ISLAND BOAT CO.

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

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JUL 13 1995

FCC MAIL ROOM

July 13, 1995

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

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

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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page 2

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