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National Marine Electronics Association **FCC MAIL ROOM**

OCTOBER 20, 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
1919 M STREET NW
WASHINGTON DC 20554

RE: DOCKET NO. 95-54 (FCC 95-170)

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DEAR MR. SECRETARY:

THE NATIONAL MARINE ELECTRONICS ASSOCIATION, A NON-PROFIT TRADE ASSOCIATION DEDICATED TO THE MARINE ELECTRONICS INDUSTRY, WOULD LIKE TO VOICE ITS COMMENTS TO THE COMMISSION ON AN EX-PARTE BASIS REGARDING THE NOTICE OF PROPOSED RULEMAKING TO ALLOW OWNERS AND OPERATORS OF SHIPS SUBJECT TO THE ANNUAL INSPECTION REQUIREMENTS OF THE AGREEMENT BETWEEN THE UNITED STATES AND CANADA FOR THE PROMOTION OF SAFETY ON THE GREAT LAKES BY MEANS OF RADIO (GREAT LAKES AGREEMENT) TO HAVE THE INSPECTION PERFORMED BY A PRIVATE SECTOR CLASSIFICATION SOCIETY INSTEAD OF BY COMMISSION STAFF.

THE NATIONAL MARINE ELECTRONICS ASSOCIATION PROPOSES THAT AN FCC-LICENSED TECHNICIAN WITH RADAR ENDORSEMENT BE THE CERTIFYING ENTITY INSTEAD OF A PRIVATE SECTOR CLASSIFICATION SOCIETY SUCH AS THE AMERICAN BUREAU OF SHIPPING. THE FCC-LICENSED TECHNICIAN MUST BOARD THE SHIP TO VERIFY THE OPERATIONS OF THE EQUIPMENT AND REPAIR THE EQUIPMENT IF NECESSARY PRIOR TO THE FCC INSPECTION AND FROM A FINANCIAL STANDPOINT, THIS COULD SAVE THE SHIPOWNER FROM PAYING TWICE FOR SERVICES WHICH COULD BE PERFORMED BY THE SAME ENTITY. IT ALSO ALLOWS THE SHIP TO RETURN TO SERVICE FASTER.

THE GREAT LAKES AGREEMENT IS INTENDED TO PROMOTE SAFETY OF LIFE AND PROPERTY ON THE GREAT LAKES BY MEANS OF RADIO. WHO ELSE IS BETTER QUALIFIED THAN THE FCC-LICENSED TECHNICIAN WITH RADAR ENDORSEMENT? THE FCC HAS PLACED ITS CONFIDENCE IN THIS GROUP OF INDIVIDUALS AND COULD EASILY RELY ON THEIR EXPERTISE AND KNOWLEDGE.

REQUIRING MEMBERSHIP IN THE IACS FOR THE FCC-LICENSED TECHNICIAN WOULD NOT BE NECESSARY UNLESS THERE WOULD BE SOME SIGNIFICANT ADVANTAGES.

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RANDOM INSPECTIONS BY THE FEDERAL COMMUNICATIONS COMMISSION WOULD BE AN ADDED SAFETY NET AND WOULD BE SUPPORTED BY THE NATIONAL MARINE ELECTRONICS ASSOCIATION.

IF THE FEDERAL COMMUNICATIONS COMMISSION WISHES TO TURN OVER INSPECTIONS TO ANOTHER ENTITY, THEN IT SHOULD NOT BE INVOLVED IN INSPECTIONS EXCEPT FOR RANDOM INSPECTIONS.

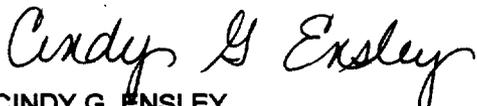
BENEFITS TO THE MARITIME INDUSTRY TO HAVE AN FCC-LICENSED TECHNICIAN WITH RADAR ENDORSEMENT PERFORM THE ANNUAL INSPECTIONS INCLUDE ADDITIONAL WORK FOR THE TECHNICIAN AND/OR HIS PLACE OF EMPLOYMENT, THE ENCOURAGEMENT OF MORE TECHNICIANS TO BECOME FCC-LICENSED AND HAVING THE INSPECTION PERFORMED BY AN EXPERIENCED ENTITY THAT HAS WORKING KNOWLEDGE OF THE SHIP AND ITS EQUIPMENT.

UTILIZING THE SKILLS OF AN FCC-LICENSED TECHNICIAN TO PERFORM SHIP INSPECTIONS WOULD NOT DECREASE SAFETY, A VITAL CONCERN OF THE FCC.

THE NATIONAL MARINE ELECTRONICS ASSOCIATION REQUESTS THAT ITS COMMENTS BE CONSIDERED PRIOR TO MAKING A FINAL DETERMINATION AFTER THE STUDY IN COOPERATION WITH THE UNITED STATES COAST GUARD AND THE CANADIAN COAST GUARD. IF THE NATIONAL MARINE ELECTRONICS ASSOCIATION CAN BE OF ASSISTANCE DURING THESE PROCEDURES, WE WELCOME THE PARTICIPATION.

RESPECTFULLY SUBMITTED,

NATIONAL MARINE ELECTRONICS ASSOCIATION


CINDY G. ENSLEY
PRESIDENT

/CGE

CC: NMEA BOARD OF DIRECTORS