



PARADISE CRUISE, LTD.

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27 May 1996

Office of the Secretary
Federal Communications Commission
Washington, DC, 20554

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FCC MAIL ROOM

RE: Docket no. 95-55

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Sir;

We note that the FCC is taking a welcome lead in reducing the redundancy and expense of compliance with Government regulation. I only hope many other regulatory organizations may take heed and follow your lead. I do sincerely feel that you have found a way to achieve your goal without any sacrifice of safety for the U.S. fleet. Thank you.

In answer to your request for comments I offer the following:

- A. There is no need to enter into contracts in order to specifically authorize one FCC licensed technician over another to perform the periodic inspections of shipboard radio telephone equipment. Any licensed technician holding the proper class of license for the station involved should be automatically authorized to perform the inspection and to certify that the station is or is not in compliance with the applicable rules. I do think a guide specific to each type of shipboard station and it's specific certification should be made available so that the technician and the person co-signing on behalf of the vessel should both know what must be encompassed by the inspection in progress.
- B. The minimum licensing requirements as proposed most certainly authorize persons who have already proven their knowledge in the subjects required. As above in item A, I do feel that the use of a guide to the particulars of the treaty and law requirements for each type of certification is necessary in order to ensure consistent application of the rules.
- C. The U.S. Coast Guard inspects passenger ships quarterly and small passenger vessels at least annually and at each inspection requires a practical demonstration of the gear fitted, as well as conducts a review of all of the ship's required certificates for currency and validity. This is sufficient.

Thank you for the opportunity to comment.

FOR PARADISE CRUISE, LTD.

REGINALD A. WHITE
VICE PRESIDENT, OPERATIONS

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