

June 18, 1996

Secretary
Federal Communications Commission
1919 M Street NW
Washington D.C. 20554

RECEIVED
JUN 24 1996
FCC MAIL ROOM

Dear Sir:

Enclosed are comments in CI Docket No 95-55, the comment deadline for which has been extended until June 24. Please enter these comments into the record. Thank you.

Sincerely,



Gerhard J. Straub

DOCKET FILE COPY ORIGINAL

No. of Copies rec'd
LRS:ABCOE

0+4

Comments of Gerhard J. Straub: CI Docket 95-55

III. FCC Control of Inspections

3. In order to prevent abuses and widely differing techniques and procedures for conducting inspections, it is imperative that the Commission develop a set of standard procedures and forms for conducting such inspections. While there will always be some differences encountered when inspections are performed by different individuals, it is unfair to vessel operators to subject them to wildly varying inspection protocols. With inspections conducted by FCC personnel, there is more central control of inspection methods to ensure fairness and safety. This consistency is lost unless strict inspection protocols are established.

IV. Certification of Inspection

4. I strongly disagree that the private inspector be allowed to issue a certification on behalf of the United States of America. This is a tremendous responsibility and liability to place on an individual. It is suggested, as stated above, that a standard inspection form issued by the FCC be used for the private ship inspection. The results of the inspection should be forwarded to the Commission on the provided form and then the Commission could issue the certification on behalf of the United States of America. This would still save significant expense for the FCC, since the major expense is the time of the inspector, while not placing an undue burden on individuals.

V. Conclusion

5. This is a very serious step that the Commission is taking. I believe that, because of the safety issues involved here, the responsibility for ship inspections can not be completely delegated to the private sector. While not in favor of this proposal, with the above suggested modifications, I believe that the proposal could be workable.

Respectfully submitted,

By 
Gerhard J. Straub, P.E.

June 18, 1996

Gerhard J. Straub, P.E.
P.O. Box 395
Sonoma, California 95476