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I operate a US Coast Guard inspected and certified 305-passenger vessel on rivers, have an FCC General Radio Telephone Permit and am a retired Air Force Communications/Electronics Maintenance Officer. Based on my years of communications experience, I absolutely support the Coast Guard effort to have a blanket waiver to allow class ?D? VHF DSC radio instead of class ?A? DSC radio to meet carriage requirements. In the event of an emergency, commercial vessels are required by law to make a call on VHF channel 16 and to call a Coast Guard 800 number. Using class ?D? DSC only serves as an additional way to notify others of vessel Latitude and Longitude. On inland rivers, river mile information is far more expedient than L and Lo for rapidly and accurately locating a vessel.

In addition, this waiver will save all similar vessel operators the \$195.00 FCC application fee to get an individual waiver of this unnecessary requirement. This effort by the Coast Guard makes excellent and obvious sense to eliminate the negative economic and regulatory impact on small businesses.