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June 17, 2016

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 16-162
COAST GUARD REQUEST FOR WAIVER TO PERMIT USE OF CLASS D VHF DIGITAL SELECTIVE CALLING EQUIPMENT IN LIEU OF CLASS A EQUIPMENT

Ladies and Gentlemen:

Thank you for this opportunity to comment. I own and operate three small passenger vessels inspected under Title 46, Subchapters T & K by the U.S. Coast Guard in Marina del Rey, CA. I support the Coast Guard's request to allow a blanket waiver for domestic passenger and small passenger vessels to carry Class D VHF Digital Selective Calling (DSC) equipment in lieu of Class A equipment. Class D equipment is more appropriate to my smaller domestic operation while providing the same basic capabilities and interoperability with the Coast Guard's Rescue 21 system as Class A equipment. I note in your May 19, 2016, notice, the Class A equipment is "*...intended for ocean-going ships to meet the Global Maritime Distress and Safety System (GMDSS) requirements...*" As a U.S. flag small passenger vessel operating on domestic-only routes my vessels are not subject to GMDSS requirements and should have never been required to carry Class A equipment.

The FCC has a waiver process allowing for the use of Class D VHF DSC equipment, but I would need to apply for the waiver and pay a $195 fee. Like the vast majority of domestic passenger and small passenger vessel owners, I am considered a small business and this is a burden I should not be required to incur. In Executive Order Executive Order 13563 of January 18. 2011, the President stated that one principle of federal regulation is to use the "least burdensome tools for achieving regulatory ends" and directed each agency to "tailor its regulations to **impose the least burden on society**, consistent with obtaining regulatory objectives, taking into account, among other things, and to the extent practicable, the **costs of cumulative regulations**." In Executive Order 13579 of July 11, 2011, the President directed that "to the extent permitted by law, independent regulatory agencies should comply with these provisions as well." FCC approval of the Coast Guard's blanket waiver application will be consistent with these two Executive Orders as it will relieve me and other small business entities from the unnecessary burden of having to apply for an individual waiver and to incur the associated $195 filing fee.

Thank you for your consideration of my comments.

Sincerely,

Daniel Ginzburg
FantaSea Yacht Charters

P 310.827.2220 F 310.827.7453 E info@fantaseayachts.com 4215 Admiralty Way, Marina del Rey, CA 90292 FantaSeaYachts.com