

Dear FCC,

I agree with the National GMDSS Implementation Task Force (GMDSS Task Force) filed a petition requesting that the Commission alter the Universal Licensing System (ULS) so as to permit operators of exempt vessels that later obtain individual ship station licenses to retain the privately-issued MMSI. Conversely, the GMDSS Task Force also recommends that the designated private entities be permitted to manage MMSIs originally issued by the Commission when the operator of a licensed vessel decides not to renew the station license. The GMDSS Task Force argues that such modifications of the licensing process would alleviate a burden on operators by eliminating the need to have the new MMSI programmed into their shipboard equipment. Another suggested benefit is that it would prevent the same vessel from being assigned two MMSIs concurrently, which wastes numbers.

Frank E. Gaffney