

I am writing to urge you to change the current licensing system to allow the FCC to integrate MMSI numbers issued by BoatUS. As I'm sure you are aware, in order for a boater who has obtained an MMSI number from BoatUS (even though the number is issued by the FCC) and Subsequently wants to obtain an FCC ship station license must remove the VHF from their boat and return it to the manufacturer for reprogramming at the owner's expense and effort. This is a needless and unnecessary inconvenience as well as a safety issue which undermines the entire DSC initiative. All the MMSI numbers come from the FCC: they should be portable regardless of whether the FCC or BoatUS distributed them. Personally, I have not applied for a ship station license (despite having one in the past), because I don't want the hassle and expense of removing my VHF for reprogramming. Additionally, I'd be without a VHF for several weeks while it was being reprogrammed. This is a needless safety risk.

I earnestly urge you to correct this situation and enable the portability and full integration of all MMSI numbers into the FCC's licensing system and to streamline the process of obtaining a ship station license. Thank you for your consideration.