

Response received 24 February 2005 from Mr B Mullan representing Inmarsat Ltd:

Annex 3

Consultation questions

Question 1: *Do you agree with the proposal to introduce a lighter, electronic licensing process? If not, please explain why.*

YES

Question 2: *Do you agree with the proposal to issue licences which remain valid for the life of the vessel? If not, please explain why.*

Not entirely. In section 4 of the consultation document, it states that the call sign would remain with the vessel until such time as the vessel was scrapped or the licence was revoked. The call sign changes with each flag change.

Provided that allowance is made for the call sign to change, and for other amendments such as change of Accounting Authority or Service Provider, during the lifetime of the vessel, Inmarsat can agree that the licence should remain valid for the life of the vessel.

Question 3: *Do you agree with the proposal to issue electronic ship radio licences free of charge? If not, please explain why?*

Yes

Question 4: *Do you agree with the proposal to apply an administrative charge when processing postal applications for ship radio licences? If not, please explain why.*

Yes – however this should be minimal, to cover costs. The administrative charge should be waived if there are few postal applications and cost for administering the charge drives up the cost in a disproportionate manner.

Question 5: *Do you agree that the transfer of licensing to the MCA would not offer any significant advantage over the existing licensing system?*

Yes

Question 6: *Do you agree that WT Act licence exemption for vessels that remain within UK territorial waters is not currently practical?*

Yes

Question 7: *Do you agree that WT Act licence exemption remains a worthwhile long term objective? If not, please explain why.*

Not worthwhile at present. For this exemption to become practical, a means of limiting the range for domestic trading vessels that do not venture outside UK waters would need to be developed.

Question 8: *Do you believe that WT Act licence exemption would have an impact on maritime safety? If so, please explain why.*

Yes.

- 1. Ships' Radio Licenses record safety radio equipment and this record needs to be referred to by Radio Surveyors, both in the UK and abroad.**
- 2. The ITU MARS database is incomplete and is likely to remain so for the foreseeable future. There is therefore a clear danger that ships' records would be unavailable from any Governmental source.**
- 3. Equipment takes much too long to be fully approved by the EU Marine Equipment Directive for Wheel Marking. Moving equipment to Annex A1 (GMDSS approval) takes much too long; revisions of the EU MED are very infrequent.**
- 4. EU MED Wheel Marking applies, in general, only to European vessel requirements**

Question 9: *Would you prefer to see the current licensing system maintained without change? If so, please explain why.*

No

Explanatory Notes:

Inmarsat Limited is a significant provider of satellite communications. Most ships that travel beyond UK territorial waters carry Inmarsat equipment for safety and commercial communications. Inmarsat satellite equipment is an IMO carriage requirement for safety of life at sea on all ships that trade outside the range of NAVTEX coverage. Inmarsat communications equipment is also carried on many other vessels, as the preferred means of providing safety and commercial communications requirements. The issue of the licensing of vessels that carry Inmarsat equipment is therefore of direct interest to Inmarsat Limited.

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Inmarsat Limited