

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

Yes, I believe this the right direction in view of rapidly increasing influence and penetration of Internet communication. However care will need to be taken in setting up the systems to ensure that provision is made for easy updating of details including the Licensee's email address.

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.

No, the license will have to be re-validated at intervals of, say, 3 years to ensure the ongoing validity of the database. Vessels will be decommissioned or abandoned, change owner and/or nationality or even founder. The last thing that may be on the Owner's mind will be to advise the licensing authority.

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, providing the cost is kept to a reasonable figure.

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

No, the MCA already hold vessel databases and have contacts with other national administrations. They have a sound understanding of the maritime environment and would seem to be the natural choice for this role.

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

Yes, operating skills would not be maintained and could not be controlled with the certain risk of jeopardizing the correct use of distress and other essential traffic. This risk would spread to international and foreign waters due to the proximity of the mainland Europe.

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

No, for the reasons given in the answer to Question 6. Correct operating procedures and practices would not be followed if operators were not trained and certificated.

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

Yes, The current rate of false alarms arising within the GMDSS system is over 90%. Operator training is essential to reduce this very high rate which results in considerable wasted effort on the part of the search and rescue and communications services. Even more importantly lack of training prejudices the reception and handling of Distress and Urgency services.

Additionally, the training of radio operators extends beyond radio operating to other essential safety equipment such as Emergency Position Indicating Radio Beacons (EPIRBs), Search and Rescue Transponders (SARTs) and NAVTEX.

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

No, the electronic licensing process has benefits and a review of the whole process could bring out further improvements to the operation of Maritime radio services.