

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Amendment of the Commission's Rules) WT Docket No. 10-177
Concerning Commercial Radio Operators)

NOTICE OF PROPOSED RULEMAKING

Comments of the National GMDSS Task Force:

With regard to Section-B: COLEM Issues – Paragraphs 12-14. Maintenance of Question Pools.

The GMDSS Task Force respectfully submits these Comments in response to Rule Making WT Docket No. 10-77 inviting comment regarding Colem Responsibilities and Maintenance of Question Pools.

The GMDSS Task Force was chartered by the U.S. Coast Guard to supplement government functions through outreach to the private sector and recommendation to regulatory authorities. The Task Force membership is broad based including over 2500 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force maintains a website at www.navcen.uscg.gov/?pageName=MaritimeTelecomms which contains numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to pending regulatory proceedings.

Background: In 1998 there were two completely separate exams for GMDSS Radio Operator.

The GMDSS Task Force was responsible for maintaining the USCG-STCW test pool and the FCC was responsible for their Element-7 test pool. The students were forced to sit for two

separate exams. There was a strong desire to merge these two exams using a single test pool that would meet the needs of both the USCG-STCW and FCC Element-7. In 1999 the training task group was charged with producing a single test pool to meet the requirements of the USCG and the FCC. It developed a 600 question test pool for a 100 question exam and subsequently developed a 300 question test pool for the 50 question exam for the Restricted GMDSS Operator' License designated FCC Element-7R. It has continued to review and submit revisions to both of these test pools and is currently engaged in a new round of revisions.

It is our understanding that it is no longer necessary to issue a public notice and then wait until the public notice is published in the Federal Register before a newly revised test pool can become official. This is a welcome development as it opens up the possibility of much quicker implementation of a revised test pool. The potential negative aspect is the possibility of too many revisions being approved. With the six month overlap between new and old test pools we could end up with more than two valid test pools at the same time.

The commission proposes to amend the rules to make the COLEMs responsible for maintaining the question pools for commercial radio operator examinations but it does not set forth any details as to how this will be accomplished. Neither does the NPRM address the question of how often the test pools may be revised. We feel both of these issues are important and submit the following:

The responsibility for FCC Element 7 and Element 7R should be delegated to the National GMDSS Implementation Task Force. This would simply codify in the rules the situation that has existed for the past 12 years. The revision cycle for these elements should be annually, with April 1st being the cutoff date for individuals to submit proposals for revisions to the Task Force. Posting and implementation of any revised test pool should be the first working day in July of each year.

The GMDSS Operator exams are in a distinctly different category from the other FCC exams. They are not exclusively an FCC exam but are a joint project between the FCC and the U. S. Coast Guard to provide a common exam test pool for two different purposes: FCC GMDSS Radio Operator's License and the U. S. C. G. STCW GMDSS Operator's Certificate.

Revisions to these test pools are made by a longstanding working group of experienced GMDSS Instructors. The working group would like to have an annual revision cycle available in order to present the latest developments in GMDSS to their students in the classroom even if they do not always take advantage of this availability every year.

We recognize that the COLEMs have different requirements and we support their position for a longer revision cycle. We are not aware of any objections from any of the COLEMs on splitting the responsibility and having different revision periods and we agree with the COLEMs that a specific rule on revision periods is essential.

The Task Force and its Training Group will be pleased to work with the FCC in structuring a revised plan for updating the Question Pools.

For the GMDSS Task Force, 24 November 2011,

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