

WT Docket No. 10-177: Reply Comments.
Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
COLEM Issues, Maintenance of Question) WT Docket No. 10-177
Pools)

NOTICE OF PROPOSED RULEMAKING

Reply Comments In regard to Section-B: COLEM issues, Maintenance of Question Pools.

Upon reviewing all of the comments filed we wish to file this “Reply Comment” in the interest of resolving some potential conflicts, addressing some errors in the original comment filings and add some further clarification to the language.

In any instance where these comments are in conflict with the original filings we ask the commission to consider the language in this document as canceling and replacing the original language.

It is essential that specific rules be implemented to accomplish the following:

Specify who shall be responsible for managing the test pools.

Specify when the test pools shall be:

Posted for availability to the public

After posting: a period in which the public may challenge any of the posted questions.

The effective date the new test pool must be used.

The effective date the old test pool expires and may no longer be used..

The old test pool shall remain posted along with the new test pool until its expiration date.

Each test pool shall provide contact information for the organization or individual responsible for maintaining the test pool data.

In the Task Force comments a posting date of April 1 and effective date of July 1 was requested. After further review we realize that this is insufficient time from the COLEMs viewpoint. Therefore we are requesting this be increased to 6 months with a posting date of March 1 and effective date of Sept. 1. We do not favor the December 1 date the COLEMs are requesting. Our experience with getting any serious work accomplished during the months of November and December has not been positive. We do not envision any problems due to different posting/effective dates between the two sets of test pools since they are on a different annual schedule as well.

We wish to clarify some of the wording in the original filings. Since the merger of the FCC and USCG test pools some 12 years ago the GMDSS test pools (FCC Elements 7 and 7R) have been managed by a working group of experienced GMDSS instructors under the National GMDSS Implementation Task Force through their Training Task Group. Others mentioned in the original filings have not participated although anyone is welcome to join the working group.

Specific wording for the revised rules follows:

Section B: COLEM issues, Maintenance of Question Pools.

Sec. 13.215 Question pools.

The question pool for each written examination element will be composed of questions acceptable to the FCC. Each question pool must contain at least five (5) times the number of questions required for a single examination. The FCC will issue public announcements detailing the questions in the pool for each element. COLEMs must use only currently authorized (through public notice or other appropriate means) question pools when preparing a question set for a written examination element.

(a) Responsibility for maintenance of test pools:

(1) Elements 1, 3, 8 and 9 shall be the responsibility of the COLEMs. At least 5 of the COLEMs shall elect or designate an organization or individual to oversee the maintenance of the test pools.

(2) Elements 7 and 7R shall be the responsibility of the National GMDSS Implementation Task Force.

(b) Schedule for posting new test pools, public comment period, expiration of the old test pool and effective date of new test pools.

(1) New test pools for elements 1, 3, 8 and 9 shall be on a 4 year cycle starting as follows:

(i) Posted on the FCC website on December 1, 2012.

(ii) Open for public comment through January 31, 2013.

(iii) Become effective for examinations on July 1, 2013.

(iv) Old test pools shall expire on June 30, 2013 and may not be used after that date.

(2) New test pools for elements 7 and 7R shall be on an annual cycle starting as follows:

(i) Posted on the FCC website on March 1, 2011.

(ii) Open for public comment through March 31, 2011.

(iii) Become effective for examinations on September 1, 2011.

(iv) Old test pools shall expire on August 31, 2011 and may not be used after that date.

(3) The FCC shall post contact information for the organization or individual responsible for a specific test pool.

(4) All requests for additions, deletions or revisions filed during the public comment period shall be reviewed for approval or rejection by the organization or individual responsible for a specific test pool. Any rejected proposals are subject to appeal to the FCC.

Respectfully submitted,

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