

Email response received 3 May 2005 from John Bowen:

Ofcom Consultation on a Proposal to Reform Ship Radio Licensing
Consultation Questions and Answers

Question 1:

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

Basically "yes" but with yet to be demonstrated procedures.

PDFs can be downloaded by anyone with an insight into electronics, so like the existing Voting fiasco, need more thought than Ofcom normally give it.

PDFs are almost too easy - not 100% forgery proof.

How would people be notified in the event of Rule changes - people change their E-Mail Address very often - I know I run a Database for a few hundred.

All boating people I have spoken with like the idea of not having a yearly Licence (and paying some £20 odd per year).

However Captain's maintain that if any of the existing Inspection Procedures are reduced, Owners would tend to allow equipment to fall into disrepair to save money.

Question 2:

Do you agree with the proposal to issue licences which remain valid for the lifetime of the vessel ?

If not, please explain why.

No.

Suggest 5 years.

Question 3:

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

See answers to Q 1 & 2.

Initially it seems attractive but not if Ofcom are going to wash their hands of everything to do with ship's Databases & "Safety at Sea".

Question 4:

Do you agree with the proposal to apply an administrative charge when processing postal applications for ships radio licences?

If not, please explain why.

Why not?.

A moderate charge every 5 years would, I am sure, be acceptable.

Question 5:

Do you agree that the transfer of licensing to the MCA would not offer any significant advantages over the existing licensing system?

Years ago someone came to my door when I was about 10 and said "is it not true that your Mother is not in?"

Your question smacks of something similar.

I think it would be a very good idea to transfer the whole responsibility of Ships Licensing to the MCA.

I also think "that bearing in mind Ofcoms wish to wash their hands of all work" that they should prepare a Bill on Parliament to give the MCA the legal responsibility to represent the UK Shipping Authority on all National & International bodies. They should also be charged with maintaining the Shipping Database which Ofcom seem to want to let slide.

Question 6:

Do you agree that the WT Act licence exemption for vessels that remain within UK territorial waters is not practical?

If not, please explain why.

Should be maintained as it was before Ofcom came into being.

Question 7:

Do you agree that WT Act licence exemption remains a worthwhile long term objective?

If not, please explain why.

Another double negative - see answer to Q6.

Question 8:

Do you believe that WT Act licence exemption would have an impact on maritime safety?

If not, please explain why.

Nothing should impact of Safety at Sea except improvements.

I am told that at present if you are sailing from America and request assistance from the Irish Coastguards unless you can quote a current (MMSI) Shipping Number they can refuse to assist you. If the Database is not current how will they be able to look you up in the future?

Question 9:

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

No, there is always room for improvements but they must be thought out with ALL the current Authorities.

Give the whole job to the MCA - they are the shipping professionals - not Ofcom.

Give them the job to issue ships radio call-signs and MMSI's.

End of my Submission.