

Response received 25 February 2005 from Individual #2:

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

No – at least not in the manner proposed. That there is a need to streamline the current archaic system is beyond debate. However, it should be of concern that the system proposed would result in two fundamental factors :

1. There would immediately be a complete database of leisure craft of any size which may carry a radio. A free license as promoted will have great take-up. It will simply be a matter of transferring that data internally within government agencies in order to establish the basis for compulsory registration of leisure craft. That in itself is no bad thing but it should be done openly and not via a back door.
2. Apathy will rule. The data base will very quickly go out of date and it will become a superb vehicle for identity fraud as another piece of official I.D. paperwork. More importantly, any future legislative changes as outlined above would require consultation but it is improbable that all the licensees would take any note of such consultation if it is electronically based.

In simple terms, I would suggest that such an open and unregulated system could easily be in contravention of certain privacy and human rights issues.

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. A five year period as with registration documents would ensure a level of control.

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

No. See above. The current fee is minimal. There will be a cost associated with the process however streamlined and it should in part be borne by the applicant. It is difficult to see why ship radio licenses should be treated differently to any other license. A road vehicle has to be registered with a fee, why not a ship's radio?

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.

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. Not really. It would make sense to me for the MCA to have the complete gamut of marine responsibilities. Radio matters already are under MCA supervision, why not hand over the ship radio licensing as well and release much needed resources at ofcom to deal with the needs of the British Consumer.

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.*

No. For security, safety and efficiency reasons.

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

Yes most definitely. Even with the current controls there numerous examples to be heard daily of poor procedures and misuse of equipment. With no proper control of the equipment license then there will be no incentive for operators in the leisure sector to get proper training and more importantly adhere to recognized established procedures.

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

Yes, partially. For the reasons outlined above. It should however be extended to a five year period and be fully renewable online, currently not the case. It should also not be possible to register the equipment for a license with providing evidence of a VHF / GMDSS / RT certificate