

Email response received 12 April 2005 from The Sailing and Cruising Association:



## The Sailing and Cruising Association

BM Sailing  
London  
WC1N 3XX

Ofcom  
Riverstone House  
2A Southward Bridge Road  
London SE1 9HA

11<sup>th</sup> April 2005

Dear sir,

Thank you for your consultation document regarding the proposal to reform ship radio licensing. Please find below the views of the Sailing & Cruising Association, a club of 350 members.

The matter was discussed at our committee meeting and with the membership via our web-based communications forum. The answers below reflect our views.

Yours sincerely

Andrew Amery  
Powerboat Co-Ordinator

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

**YES**

**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.

**YES – Subject to renewal on change of ownership / name etc**

**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**

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

**YES**

**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**

Change would require major Europe wide consultation and agreement. Even if agreed, without extensive education of other nations enforcement organisations confusion would exist. ICC's for cruising in French waters are a classic example of such confusion, where they are not legally required, but are nonetheless still expected by the French authorities. For the sake of simplicity it is easier to maintain a basic licencing system.

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

**YES**

History shows that total deregulation often results in abuse of systems. The primary role of a ships radio is for safety, de-regulation leave a potential for the system to plunge to the levels of a CB radio system. Additionally the records held can in some instances assist search and rescue.

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

**No** – The current system is bureaucratic and costly and needs reforming; but not removing.