Before the Federal Communications Commission Washington, DC 20554

| In the matter of |) | |
|--|------------|------|
| |) | |
| Updating Commercial Operator License Examination | n) DA 06-9 | 67 |
| (COLE) Question Pools for Elements 7 and 7R |) | |
| |) | |
| Public Notice by the Wireless Telecommunications |) | |
| Bureau Released 2 May 2006 |) 31 May 2 | 2006 |

COMMENTS OF THE NATIONAL GMDSS TASK FORCE

The Global Maritime Distress and Safety System (GMDSS) Task Force respectfully submits these comments in response to Public Notice DA 06-967 released 2 May 2006 by the Wireless Telecommunications Bureau.

The National Implementation Task Force for the Global Maritime Distress and Safety System (GMDSS) 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 broadbased including over 1500 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force maintains a website at <u>www.navcen.uscg.gov/marcomms</u> which contains numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to pending regulatory proceedings.

In June 2000, the Task Force proposed the common Question Pool to be used for GMDSS qualification by both the Coast Guard and the FCC. Both agencies adopted the Task Force's recommendations. Recently, it became apparent to the Task Force that a few questions needed to be updated to accommodate changes in international regulations or to clarify questions which some candidates found confusing. An ad hoc group was commissioned including instructors from most GMDSS schools. The proposals of the ad hoc group to amend the GMDSS Question Pools were approved by the Task Force at its regular meeting on 6 January 2006 and forwarded to the Coast Guard and the FCC recommending implementation.

Since the ad hoc group had invited all interested experts to participate and the Task Force approved their recommendations without comment, we now urge the Commission to adopt the changes as recommended.

For the National GMDSS Implementation Task Force

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