

GMDSS Implementation Task Force  
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Mr. Robert Markle  
President, Radio Technical Commission for Maritime Services  
1800 N. Kent St. Suite 1060  
Arlington, VA 22209

Dear Mr. Markle,

I am writing on behalf of the GMDSS Task Force which met on 6 January 2011. At that meeting, we had your briefing on the activities of the relevant RTCM Special Committees, including SC110 on Emergency Beacons. We also had a briefing from the National Transportation Safety Board, and were reminded of one of the NTSB recommendations arising from the LADY MARY investigation:

For commercial vessels required to carry 406-MHz emergency position-indicating radio beacons (EPIRBs), mandate that those EPIRBs broadcast vessel position data when activated. (M-10-1)

It is the sense of the GMDSS Task Force that RTCM's standard on EPIRBs, currently under revision, should include a revision that requires an embedded Global Navigation Satellite System (GNSS) / Global Positioning System (GPS) processor, enabling the EPIRB to transmit Location Protocol Beacon Messages. The Federal Communications Commission will then be able to reference the revised RTCM standard and comply with the NTSB recommendation.

When embedded GPS processors were first introduced as optional equipment on EPIRBs, they were fairly expensive, which resulted in a significant price premium. Nevertheless, they were a success in the market, with many informed buyers electing to spend the extra money for an EPIRB which could, in some cases, enable a Search and Rescue operation to begin hours earlier than it would otherwise. Even with the coming MEOSAR satellite system which will include a position with every alert, we understand that an EPIRB with an embedded GNSS processor, will probably provide a more accurate location. Given the availability of GNSS processors that have improved performance and much lower prices than those of just a few years ago, we believe that RTCM should make these a mandatory part of EPIRBs built to RTCM standards.

Sincerely,

Jack Fuechsel  
Captain, USCG (Ret.)  
Director, GMDSS Task Force