

GMDSS Implementation Task Force
1600 N. Oak St; #427; Arlington VA 22209

10 January 2011

Admiral Robert J. Papp, USCG
Commandant, U.S. Coast Guard
2100 Second Street SW
Washington, DC 20593

Dear Admiral Papp,

I am writing on behalf of the GMDSS Task Force which approved this letter at its regular meeting on 6 January 2011. The Task Force has long advocated that all vessels going offshore be equipped with Emergency Locator Beacons and the recent passage of the Coast Guard Authorization Act of 2010 (Section 618 of Public Law 111-281) cleared the way for the necessary regulatory action.

The GMDSS Task Force was chartered by the Coast Guard to supplement governmental functions in facilitating implementation of the Global Maritime Distress and Safety System (GMDSS) introduced by the International Maritime Organization (IMO). The Task Force membership is broadbased including over 2500 representatives of governmental authorities, commercial vessel owners and operators, recreational boating interests, service agents, manufacturers, trade associations, training institutions, and maritime labor organizations. The Task Force maintains a portion of the Coast Guard maritime telecommunication website which contains records of Task Force meetings, numerous GMDSS Information Bulletins, and letters and Petitions seeking regulatory actions. The Task Force has made numerous recommendations to both the Coast Guard and the FCC, most of which have been adopted.

By way of background, the Task Force has devoted its primary attention in recent years to recreational vessel issues because the large ships have been fully GMDSS compliant since 1999 and recreational vessels are permitted to use all GMDSS sub systems without any training and licensing requirements. In May of 2006 the Task Force recommended to your predecessor that a Hawaiian Law which took effect in January of 2004 requiring VHF radio or EPIRBs on all vessels going offshore be made a national requirement. The National Association of State Boating Law Administrators (NASBLA) then developed a Model Act calling for coastal states to emulate the Hawaiian Law. The Model Act may be viewed at www.nasble.org/files/public/Model%20Acts/EPIRB-PLB-VHF%20Radio%2092105.pdf. The Coast Guard response to the Task Force from the Office of Boating Safety indicated that regardless of the possible benefits, new legislative authority would be required before any such regulatory action could proceed. Since then, the Task Force has had to limit its advocacy to calling for voluntary carriage but we continue to have numerous SAR cases involving amateur sailors in trouble offshore without any communications or emergency locating equipment.

Now that the Coast Guard has the necessary legislative authority, the Task Force is renewing its recommendation that appropriate regulatory action be undertaken requiring all recreational vessels going more than three miles offshore be equipped with an emergency locator beacon. The language of the Authorization Act is broad enough to include EPIRBs and Personal Locator Beacons (PLB) and certain other devices being sold for similar purposes if they adhere to appropriate standards. Such standards are now under development by the RTCM in response to a request from the Coast Guard.

In addition, the Task Force would recommend that the Coast Guard consider whether a VHF Radio with Digital Selective Calling (DSC) and an embedded or connected GPS should be determined to be equivalent to an emergency locator beacon for vessels which remain within 20 miles of the coast. This VHF radio option would enable the near coastal alerts to be handled directly by the Coast Guard's highly effective Rescue 21 system and also enable the alerts to be heard by other vessels in the vicinity. In making this request, the Task Force is mindful that a standard specification for a handheld VHF-DSC radio with embedded GPS is under development by the RTCM and the International Telecommunications Union (ITU), largely as a result of a U.S. Coast Guard initiative. This new device is expected to become the radio of choice for smaller craft with mass production making it an affordable option.

Feedback available to the Task Force indicates that experienced offshore operators would not object to the proposed new regulation. The Task Force considers that vessels operating offshore without emergency locating equipment should be considered manifestly unsafe.

A national requirement would preempt state laws and insure a standardized approach. In addition to the obvious benefits of lives saved, it is very important to ensure that this readily available technology is deployed on vessels offshore to enable the Coast Guard to promptly and efficiently locate vessels in distress. In a high percentage of SAR cases, the Coast Guard expends extraordinary flight hours searching for overdue vessels with either a vague location or none at all. With reduced government budgets expected, the Task Force feels that the Coast Guard would reap significant benefits in improved operational efficiency if offshore vessels all carried this modern locating technology.

The Task Force will, of course, be pleased to assist this effort in any way including public relations and liaison with other organizations sponsoring enhanced marine safety. We would appreciate being advised of your plans to implement this new authority.

Sincerely,

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

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