

## **Task Force Comment to Coast Guard on HF Weather Broadcasting**

14 August 2007  
Docket USCG-2007-27656

### **COMMENTS OF THE TASK FORCE FOR THE IMPLEMENTATION OF THE GLOBAL MARITIME DISTRESS AND SAFETY SYSTEM (GMDSS)**

The GMDSS Task Force 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 broad based including over 1600 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force maintains a website at [www.navcen.uscg.gov/marcomms](http://www.navcen.uscg.gov/marcomms) which contains numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to pending regulatory proceedings.

The Task Force understands the motivation for this Public Inquiry and has tried to assist the Coast Guard in getting the word out to users of the HF Maritime Weather broadcasts so that they might comment. The Task Force is not a direct user of the broadcasts and is therefore unable to respond to the individual questions contained in the Coast Guard release tailored to areas of operation and alternative facilities. Never-the-less, the Task Force wishes to go on record with the following observations.

The Task Force is concerned that many of the primary users of the HF broadcasts such as sailing vessels on extended voyages may not 'get the word' since there hasn't been time for boating magazines to run background articles and for the mail to catch up with these itinerant vessels. We are less concerned with SOLAS vessels which have their GMDSS mandated Navtex and SafetyNET systems for dissemination of Marine Safety Information including weather.

There is a tendency to assume that the wide variety of services available over the internet renders broadcast systems obsolete but in reality only the largest of seagoing vessels can afford continuing internet connections while at sea.

While it might be nice to replace HF weather broadcasts with satellite delivered graphic and text weather broadcasts, it has to be noted that systems affordable to the recipients have not been developed and that governments are not yet making broadcasts over satellites suitable for maritime reception with the exception of text broadcasts via the Inmarsat SafetyNET system. That system was designed for SOLAS ships and lacks the localized data many of the smaller vessels need.

Reception of HF broadcast messages via Facsimile or text is a proven technology to which vessels of all sizes have become accustomed. It is also a very cost effective

technology for the receiving vessels. Facsimile broadcasts are not part of the GMDSS but many mariners on vessels of all sizes make the effort to copy those broadcasts since they have been trained to read weather charts and are better able to visualize weather patterns in that format.

The Task Force considers that the Coast Guard is the lead agency providing radio safety services to mariners at sea and should be very careful in backing away from that role. Surely it is in the best interests of the taxpayers to concentrate such functions in a single government agency.

In summary, if affordable delivery alternatives are not expected to become available in the near future, the Task Force recommends that the Coast Guard invest in some new HF transmitters as a national asset available for a variety of Coast Guard missions under the expanding Homeland Security programs.

For the GMDSS Task Force,

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