

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the matter of	)	
	)	
Amendment of FCC Rules Concerning Maritime Automatic Identification Systems (AIS)	)	WT Docket No. 04-344
	)	
Petition for Rulemaking by the National Telecommunications and Information Admin.	)	RM-10821
	)	
	)	29 December 2004

**COMMENTS OF THE NATIONAL GMDSS TASK FORCE**

The Global Maritime Distress and Safety System (GMDSS) Task Force respectfully submits these comments in response to the Notice of Proposed Rulemaking published in the Federal Register on 15 November 2004 (69FR65570).

The National Implementation Task Force for the GMDSS supplements 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 [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 desires to comment on the Commission's Further Notice of Proposed Rule Making regarding spectrum assignments in the International Maritime VHF Radio Band. In general, the Task Force fully concurs that the Commission "should align allocation of this spectrum with that of the ITU with respect to use of the spectrum for port operations and ship movement services, in the interest of promoting compatibility with international shipping and increased flexibility." The Task Force also strongly endorses the Commission's position that no rule changes "undermine the purpose of providing for the unique distress, operational, and personal communications needs of vessels at sea and on inland waterways" by enabling "a de facto reallocation or otherwise remove this spectrum from the maritime community."

More specifically, the Task Force supports the Commission's proposal to designate maritime VHF channels 87B and 88B for exclusive Automatic Identification System (AIS) use in the U.S. which also aligns with the international designation of those channels for AIS. Although the Commission proposes to reserve the AIS channels in maritime VPCSA's, the Task Force notes the intent to extend AIS requirements to virtually all navigable waters of the U.S. for enhanced homeland security and therefore recommends that the AIS designations accordingly, also cover all U.S. navigable waters.

For the National GMDSS Implementation Task Force

Jack Fuechsel  
Director, GMDSS Task Force  
7425 Elgar Street; Springfield VA 22151  
703-941-1935; [gmdsstf@cox.net](mailto:gmdsstf@cox.net)

file: fcc-10.doc