

National GMDSS Implementation Task Force
1600 North Oak Street, #427; Arlington VA 22209

30 May 2009
File: fcc-20.3

Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

**PETITION TO REQUEST THAT FCC AMEND THE RULES TO PERMIT THE
USE OF MARITIME VHF PORTABLE RADIOS ASHORE NEAR AREAS OF
MARITIME AND BOATING ACTIVITY**

The GMDSS Task Force. The National GMDSS Implementation Task Force was chartered by the U.S. Coast Guard to supplement government functions in expediting the implementation of the Global Maritime Distress and Safety System (GMDSS) adopted by the International Maritime Organization (IMO). The Task Force membership is broad-based including over 2000 representatives of government authorities, commercial vessel owners and operators, recreational vessel interests, training institutions, service agents, manufacturers, trade associations and maritime labor organizations. The Task Force maintains a portion of the Coast Guard web site at www.navcen.uscg.gov/marcomms/ that contains numerous GMDSS Information Bulletins, records of Task Force meetings, and various Task Force letters recommending regulatory action. The Task Force has made numerous recommendations to both the Coast Guard and the FCC, most of which have been adopted.

Background. Existing FCC rules CFR 47 Part 80.115 (a) (2) prohibit the use of a marine VHF radio transmitter to communicate between a vessel and a member of the vessel's shore party when they are on land within VHF range of the vessel. Violation of this rule is a common occurrence due to the need for communication between the vessel and the

shore party and the ready availability of marine VHF portable radios for use on shore. Existence of this frequently ignored and unenforced rule is detrimental to the respect for FCC rules all mariners depend upon.

Recommended Rule Change.

The Task Force recommends a change in the rules for use of marine VHF transceivers to specifically allow the use of portable maritime VHF radios by persons on shore, within three statute miles for the purpose of communicating with persons on the vessel. The Task Force further recommends that this provision apply to port areas, navigable rivers and waterways, and to the general vicinity of inland lakes supporting commercial and recreational boating activity

Approval. This Petition was adopted by the GMDSS Implementation Task Force at its regular meeting on 8 May 2009.

Submitted by:

Captain Jack Fuechsel, USCG (Ret.)
Director, GMDSS Task Force
1600 N. Oak Street, #427
Arlington VA 22209
Phone: 703-527-0484
Fax: 703-527-8095
Email: gmdss@comcast.net

File: fcc-20.3.doc