

GMDSS Task Force
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**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

In the Matter of)	
)	
Amendment of the Commission's Rules)	WT Docket No. 14-36
Regarding Maritime Radio Equipment and)	
Related Matters)	
)	
Petition to Request that FCC Amend the)	RM-11540
Rules to Permit the Use of Maritime VHF)	
Portable Radios Ashore Near Areas of)	
Maritime and Boating Activity)	
)	
Petition for Rulemaking to Amend Part 80 of)	RM-11563
the Commission's Rules to Provide for a)	
Digital Small Message Service on Certain)	
Maritime VHF Channels)	
)	
Petition to Amend Part 95 of the)	RM-11667
Commission's Rules to Provide for Certain)	
Personal Radio Service Devices)	
)	
Notice of proposed rulemaking)	1 April 2014

**COMMENTS
OF THE
GMDSS TASK FORCE**

1. The GMDSS Task Force respectfully submits these Comments in response the Commission's Notice of Proposed Rule Making (Report No. FCC 14-20 adopted 27 February 2014) which established Docket WT 14-36 regarding Rule Makings 11540,

11563, and 11667 concerning petitions by the Radio Technical Commission for Maritime Services (RTCM) and the GMDSS Task Force proposing changes to the FCC Rules Parts 80 and 95.

2. 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 3500 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/?pageName=MaritimeTelecomms which contains numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to regulatory proceedings.

3. The Task Force wishes to go on record as fully supporting the proposed Rules changes dealing with new standards developed by RTCM Special Committee No. 110 adding integral GPS processors to EPIRBs and adding testing requirements for GPS-equipped PLBs, RTCM Special Committee No. 119 to incorporate the standard for Maritime Survivor Locating Devices, RTCM Special Committee No. 128 to incorporate the standard for Satellite Emergency Notification Devices (SEND), clarification of the Radar Rules in accordance with the recommendations of RTCM Special Committee 112 and certification for AIS-SARTs. Many members of the Task Force participated in the RTCM Special Committees and the Task Force monitored progress of the Committee work through reports from the RTCM at each Task Force meeting. There is ample evidence that better location availability adds immeasurably to success by rescue authorities during emergencies not only for minimizing search time, but facilitating successful and timelier rescues.

4. In addition the Task Force is aware that a major US manufacturer of EPIRBs has recently ceased selling versions without an integral GPS receiver and has reduced the prices of its EPIRBs with integral GPS receivers to the prices of its withdrawn versions without GPS receivers. The NTSB had previously estimated that adding integrated GPS to EPIRBs would add about one hundred dollars to the cost of an EPIRB. It now appears this would no longer be the case and there would no longer appear to be a cost penalty to mandating EPIRBs with integral GPS receivers. As a result, given the significant advantages that these devices provide to both persons in distress and the rescue services, the Task Force would recommend a rapid phasing out of EPIRBs that do not comply with the new RTCM standard. We would propose the following dates for consideration by the FCC:

- Cease Certification of new EPIRBs that do not meet the new standard one year after the final Rule becomes effective
- Cease Manufacture of EPIRBs that do not meet the new standard three years after the final Rule becomes effective
- Cease Sale of EPIRBs that do not meet the new standard four years after the final Rule becomes effective
- Cease Use of EPIRBs that do not meet the new standard six years after the final Rule becomes effective

This later date has been suggested to permit boat owners who purchase an EPIRB during 2014 to obtain the full 5 year life from the device before the battery would need changing thus mitigating the costs of the switchover.

5. With relation to EPIRBs, the Task Force would like to point out that language in Paragraph 11 of the NPRM does not make it clear that discontinuing EPIRBs operating on 121.5 and 243.0 MHz does *not* mean that those EPIRBs operating on 406 MHz with 121.5 and 243.0 MHz homing frequencies are not authorized. Therefore, when an Order is issued by the Commission in this proceeding, it should make clear that 406 MHz EPIRBs are still authorized to use 121.5 and 243.0 MHz homing signals.

6. On the point of whether the FCC should revise its rules to incorporate a more recent version of COSPAS-SARSAT T.001 and T.007 the Task Force would suggest not, on the basis that COSPAS-SARSAT tends to update these documents on an annual basis and it isn't possible to keep the rules in sync with their changes. Therefore, it would be better to simply rely on the references in the RTCM standards.

7. On the issue of updating the PLB requirements the Task Force understands that most PLBs on sale in the USA today are already equipped with GPS processors, and should have been tested for GPS processor performance. The revised RTCM standard establishes a consistent standard testing protocol. There will be some cost impact of this testing, but we do not believe that it will materially affect PLB prices. As the additional requirements were first introduced in 2010 and manufacturers have been aware of them for 4 years now the Task Force would recommend a rapid transition period to the new requirements as follows:

- Cease Certification of new PLBs that do not meet the new standard one year after the final Rule becomes effective
- Cease Manufacture of PLBs that do not meet the new standard two years after the final Rule becomes effective
- Cease Sale of PLBs that do not meet the new standard three years after the final Rule becomes effective
- Cease Use of PLBs that do not meet the new standard four years after the final Rule becomes effective

8. RTCM also proposed that the Part 95 rules be amended to incorporate its Satellite Emergency Notification Device (SEND) standard into Part 95 of the rules. The Commission tentatively concluded that the proposed rule change is unnecessary and would not further the public interest, noting that such devices already can operate pursuant to the Part 25 MSS rules. The Task Force disagrees with this tentative conclusion and would support the RTCM recommendation to include these devices in Part 95 of the rules and require SEND devices to be certified to the RTCM standard. In

a similar way to PLBs, these devices are used by individual in situations of grave and imminent danger and as such these devices need to work correctly when required under adverse conditions. The Part 25 MSS rules do not contain any of the additional SEND performance or environmental tests required by the RTCM standard designed to ensure that SEND devices are fit for purpose. Certification of a SEND device to the RTCM standard under Part 95 would provide the general public with an assurance of a device that would function as intended when required. The Coast Guard and other rescue authorities furthermore need a standardized and reliable means for receiving distress alerting and locating signals. Users of emergency notification devices have a reasonable expectation that emergency calls from such devices will be quickly and accurately received and acted upon. Without some degree of standardization, emergency calls could easily be missed or misunderstood even if received, or not received at all by the authorities responsible for responding to the emergency. The Commission and not the responding authority has the responsibility to regulate what is transmitted over the airwaves, and in the case of distress calls, an even stricter responsibility to ensure that those calls can be accurately and reliably routed and received.

9. With respect to MSLD devices and the RTCM proposal to incorporate these within the Rules, the Task Force does not believe that devices meeting the MSLD standard would be any more expensive than devices that do not meet the standard, assuming that the later are fit for purpose and use in a marine environment. As with any potentially lifesaving device, the Task Force considers it important that the mechanical and ergonomic aspect of the device as well as its labelling and user instructions are fit for purpose and as such would strongly support the coordination of applications for equipment certification for MSLD devices with the Coast Guard. Finally the Task Force believes that MSLD devices approved under waiver that do not meet all the requirements of the RTCM MSLD standard should be required to be recertified or cease manufacture by January 1, 2016.

10. Because AIS-SARTs are an alternative to existing 9 GHz Radar SARTs, there is no requirement for anyone to cease the manufacture, sale or use of these later

devices. There is, therefore, no cost or other impact as a result of the introduction of AIS-SARTs apart from a benefit in that AIS-SARTs show up more readily on other AIS Transceivers and Receivers than Radar SARTs do on some radars. Accordingly, AIS-SARTs offer the user a potential advantage in the probability of them being detected.

11. The Task Force desires to comment in more depth on Rulemaking RM 11540 regarding the proposal to permit use of maritime VHF portable radios by shore parties within three miles of the parent vessel. The Task Force originated this proposal by Petition on 10 June 2009 and the public comment period yielded only positive responses. We agree with the Commission that in many cases alternative radio systems may be available which would satisfy the requirement. In the case of cell phones, this would be the natural choice of most users if coverage is available due to the advanced technology and ease of use. In areas where cellular service is not available the VHF portables would be a logical choice. In those areas it is very unlikely that these low powered portables would cause interference to other services, especially when communicating with a higher powered ship station less than three miles away.

12. Furthermore because of the ready availability of cellphones and for other reasons, the numbers and use of VHF maritime radios has significantly diminished over the years. Many recreational boaters carry no radio or even a cellphone on their vessel, or carry only a cellphone despite operating in areas not having reliable cellphone coverage. The Task Force has long encouraged mariners to carry a VHF maritime radio for reasons of safety, not only for its ability for contacting the Coast Guard and other nearby vessels if in a distress, but also for many other reasons such as its use for bridge-to-bridge communications and its ability to receive maritime safety information broadcasts. Allowing mariners to communicate with their own vessel or related vessels while on shore under the authority of their ship station authorization would make their maritime radio more useful to them and would encourage more mariners to purchase and carry a VHF maritime radio. The Task Force therefore believes that the public interest and safety would be served by authorizing the use of VHF handheld radios associated

with ship stations within 3 miles of the shore. The Task Force has gone on record many times to encourage more use of VHF-FM on and near our waters because of its many advantages over other systems for safety and distress applications.

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