

Report of the GMDSS TASK FORCE Ad hoc group on MMSI Policy

21 May 2007

File: mmsi-11.2.doc

This report of the work of the ad hoc group on MMSI policy was approved by the Task Force at its meeting on 10 May 2007. The report is being forwarded to the Coast Guard and the FCC for consideration and also to the Radio Technical Commission for Maritime Services (RTCM) for such action as may be appropriate. The Task Force also approved a Petition to the FCC requesting “adoption of new policies and procedures regarding MMSI assignments.” A copy of the Petition is attached for information. The ad hoc group was established to “Review Policy and Procedures in assignment and management of Maritime Mobile Ship Identity (MMSI) Numbers to resolve registration and access discrepancies and to recommend procedures to periodically validate the Database to pave the way for large increases in MMSI registrations expected from the AIS program, Recreational Vessel (R/V) operators with DSC capable radios, and class B AIS units.”

CONCLUSIONS: The group held several meetings between June 2006 and April 2007 and was well attended with a total of 35 members participating in person or via email. The broad conclusions approved by the Task Force are as follows:

1. There are numerous problems with the administration of MMSI numbers in the U.S. which need to be resolved in order to have a smooth functioning system which meets the needs of search and rescue and homeland security with minimum inconvenience to the public.
2. There is a serious gap in the public’s understanding of the proper use of Digital Selective Calling (DSC) radios to enhance their personal safety. This is manifested by widespread failure to register for an MMSI number and interconnect the radio with a navigation receiver so as to furnish an accurate position with an automated distress alert.
3. The expected expansion of regulated and voluntary use of the Automatic Identification System (AIS) including introduction of the new Class B units, constitutes a further need to resolve issues related to management of MMSI numbers.
4. The assignment of MMSI numbers by the FCC is working well in some respects but needs modification in others:
 - a. The FCC has moved to terminate ‘fleet’ licenses whereby a group of vessels could all use the same MMSI number.
 - b. The delegation of MMSI assignment authority to BOATUS, Sea Tow, the U.S. Power Squadrons and others for vessels not requiring a Station License, is working well and is a particular benefit to recreational boaters.

c. If an unlicensed boater with an MMSI number plans to make a short international cruise, FCC regulations require him to apply for a Station License which results in assignment of a new MMSI number. This is not only wasteful of MMSI numbers but requires the boater to pay for service to change the MMSI embedded in his radio. It can also lead to duplication if the old number is not cancelled. Similarly, if a boater with a Station License decides not to renew the license, he should be permitted to retain the MMSI number and transfer to the administrative supervision of one of the MMSI registration agencies.

d. The FCC agreed to collect expanded vessel descriptive data when registering new applicants for Station Licenses to comply with a new IMO mandate to better support search and rescue operations. In order to acquire this new descriptive data for vessels licensed earlier, it is important to advise the licensees of the need for expanded data when they apply for renewal of the license.

e. The FCC does not presently use a validation program to periodically contact the registrant to verify that the registration is still current. The FCC's delegated assignment authority to other registration agencies does, however, require that they validate their registrations periodically. The National Oceanic and Atmospheric Administration (NOAA) which registers EPIRBs and PLBs used in the GMDSS system has found such a validation program to be essential in maintaining an accurate database.

5. There is no complete database of MMSI numbers available for assignment agents to verify existing MMSI numbers or for the public to check their own listings. The FCC database is publicly accessible but contains only the numbers associated with Station Licenses. The Coast Guard database maintained at their Operations System Center (OSC) in West Virginia holds all U.S. MMSIs but can only be accessed by Coast Guard authorities. Ideally, the MMSI portion of the OSC database should be made publicly accessible but this would raise privacy issues which cannot be addressed in the near term. The best near term solution seems to be providing interim access to the OSC database for MMSI assignment agents.

6. The group noted that the ITU does not publish the expanded vessel descriptive data collected under the new IMO mandate. It is not clear whether this is an oversight or whether the IMO neglected to request that the ITU publish the expanded data fields. The Coast Guard as the lead agency for IMO matters should pursue this through appropriate channels.

7. The group found numerous cases of duplicate MMSI numbers, most of these have been resolved and in the case of Inmarsat registrations, it was determined that MMSI numbers are not being duplicated but that the OSC receives multiple records for a single ship which has more than one Inmarsat system, all using the same MMSI number.

RECOMMENDATIONS; The recommendations approved by the Task Force are as follows:

1. To all boating safety organizations: There is a clear need for a public relations campaign to sensitize boat operators to the need to register DSC radios for an MMSI number in order to activate the automated functions and to connect the radio to a navigation receiver so that an accurate position is transmitted along with the automated distress alert.

2. To the Federal Communications Commission (FCC): The management of MMSI numbers by the FCC needs to be improved so as to recognize numbers already issued by assignment agents when a boat operator applies for a Station License. There is a similar need to manage the MMSI numbers assigned with a Station License when the Licensee decides not to renew the License. There is a further need to institute a periodic validation program to insure that MMSIs issued with Station Licenses remain current. The Task approved a revised Petition to the FCC which is an expanded version of the one approved in January 2006.

3. To the U. S. Coast Guard: There is a need to make the OSC database of MMSI numbers publicly available so that service agents and assignment authorities can verify existing MMSIs and ensure proper listing of their new MMSIs. It is recommended that the Coast Guard make this data available on the public access side of the database subject to review of any privacy issues involved. MMSI assignment agents could be given access to the database until the public access can be implemented. On a related issue, the group noted that the ITU does not publish the expanded vessel descriptive data under the IMO mandate to improve search and rescue operations. The Coast Guard as the lead agency in IMO matters, should undertake to correct this through appropriate channels.