

GMDSS Task Force  
1600 North Oak Street; #427  
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14 April 2009

**COMMENTS TO THE U. S. COAST GUARD**

In the Matter of

Proposed new rules to expand vessel carriage )      USCG docket No. USCG-2005-21869  
requirements for AIS and foreign vessel )  
requirements for notices of arrival and  
departure (NOAD) at U.S. ports

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

The GMDSS Implementation Task Force respectfully submits these Comments in response to USCG docket No. USCG-2005-21869 inviting comment regarding proposed new rules to expand the vessel carriage requirements for Automatic Identification Systems (AIS) and foreign vessel requirements for notices of arrival and departure (NOAD) at U.S. ports.

**The GMDSS Task Force.** 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 more than 2000 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 Recommendations.** The Task Force is generally supportive of the scope and content of the proposed new regulations but desires to comment specifically on a few of the proposed rules as follows:

**Towing Vessels of 26 feet or more in Length and more than 600 Horsepower.** The Task Force supports this new rule as it applies to commercial towing vessels assisting large commercial vessels and managing large fleets of commercial barges. However the length and horsepower criteria may also include some of the larger vessels in the “Vessel Assistance” industry representative of the Towboat US and Seatow companies which cater to recreational craft with contracts for emergency towing. These companies rarely assist large commercial vessels and do not move barges but they perform a vital mission which relieves the Coast Guard of extensive small near shore rescue operations. It is felt that these smaller towing vessels were not targeted by the new rules for inclusion in the AIS carriage rules and that the cost of outfitting with AIS would be a burden to the operators in a relatively new industry characterized by fragile economic viability. The Task Force suggests that this industry group either be exempted as a vessel class or that the horsepower limit for towing vessels be raised to 1200 horsepower.

**Suitability of AIS Class B Equipment for Certain Craft.** The Notice of Proposed Rulemaking notes that Class B AIS equipment may not be suitable for certain high speed

and highly maneuverable craft due to the slower update of the Class B AIS data. The Task Force agrees and specifically suggests that high speed craft should carry Class A AIS equipment rather than Class B. The other situations where the use of AIS Class B might be questionable are rather difficult to adequately describe in regulations. It is worth noting, however, that the Task Force expects that large numbers of recreational craft will fit Class B AIS on a voluntary basis and that many of them will be operating in proximity to large commercial vessels carrying Class A equipment.

**Installation of AIS on Fixed Offshore Structures.** Although perhaps beyond the scope of this Notice of Proposed Rulemaking, the Task Force wishes to go on record that it believes that that fixed offshore structures as well as movable offshore vessels that are temporarily anchored present a significant hazard to navigation and should be identified by at least a Class B AIS transmission.

For the GMDSS Task Force

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