



Captain Jack Fuechsel
Director, National GMDSS Implementation Task Force
1600 North Oak St, #427
Arlington, VA 22209

DEC 29 2016

RE: Petition to request that FCC and the Coast Guard amend their respective rules to update the carriage requirements for radio safety equipment on small passenger vessels to enhance their safety and conform to the latest standards.

Dear Captain Fuechsel:

This letter provides a response to your June 9, 2014 petition for rulemaking. In your petition, you requested that the Coast Guard and Federal Communications Commission (FCC) revise various requirements of Titles 46 and 47 of the Code of Federal Regulations (CFR) concerning radio and navigation equipment standards on small passenger vessels. For the reasons explained below, the Coast Guard does not intend to initiate a rulemaking based upon your petition. This response is limited to Coast Guard action only, and should not be construed to represent the opinion or action of the FCC.

Your petition argues that the current radio safety and navigation equipment standards prescribed by the Coast Guard are inadequate for small passenger vessels, in part due to the Coast Guard's August 2013 discontinuation of the 2182/2187.5 MHz MF coastal watch. In addition, you were concerned that the smallest category of passenger vessels is not required to carry an EPIRB, and that the existing regulations were not updated to include the latest standards and technology in use.

In reviewing your petition, the Coast Guard reviewed a casualty history involving vessels during the period 2006-2015. This includes the period immediately following the August 2013 discontinuation of the 2182/2187.5 MHz watch. Included in the review were uninspected passenger vessels regulated under 46 CFR Subchapter C, and small passenger vessels inspected under 46 CFR Subchapters T and K. No history of casualties that potentially could have been prevented or mitigated by your proposed carriage requirements could be identified. The Coast Guard also analyzed the current state of the small passenger vessel industry, compliance with existing regulations, and the potential vessel owner/operator costs imposed by your proposed carriage requirements.

In summary, the Coast Guard concluded the benefits provided to the public, industry, and the Coast Guard by your proposed carriage requirements do not at this time outweigh the potential costs of such requirements. For these reasons, this petition for rulemaking is denied.

Sincerely,

A handwritten signature in blue ink, appearing to read "T.M. Brown".

T.M. Brown
U.S. Coast Guard, By Direction
Chief, Office of Standards Analysis and Development