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COMMENTS TO THE U. S. COAST GUARD

In the matter of

Proposed termination of U.S. Coast Guard) Docket No. USCG-2019-0702
Medium Frequency (MF) Broadcast of)
Navigation Telex (NAVTEX) and shift to satellite.

COMMENTS OF THE GLOBAL MARITIME DISTRESS AND SAFETY SYSTEM (GMDSS) TASK FORCE AND THE RADIO TECHNICAL COMMISSION FOR MARITIME SERVICES (RTCM)

The GMDSS Task Force and The Radio Technical Commission for Maritime Services (RTCM) respectfully submit these comments in response to USCG Docket No. USCG 2019-0702 inviting comments regarding the possible termination of MF NAVTEX broadcasts after first assuring the information contained in NAVTEX broadcasts is available via International Maritime Organization (IMO) recognized satellite services. These comments were approved by a Working Group consisting of designated representatives of both organizations.

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 recommendations to regulatory authorities. The Task Force is broad based including more than 5000 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities, both domestic and international. The Task Force maintains a website at <https://www.navcen.uscg.gov/?pageName=gmdssTaskForce> which contains numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action and comments to regulatory proceedings.

THE RTCM. The Radio Technical Commission for Maritime Services (RTCM) is an international non-profit scientific, professional and educational organization whose objectives include improving safety and survival for all at sea through the appropriate use of maritime electronic navigation and telecommunications systems and practices. Established by the U.S. government in 1947 to support technical decision-making in the area of maritime radiocommunications, RTCM is now a

membership organization¹ that supports and encourages needed improvements in maritime communications and electronic navigation. RTCM develops and publishes technical standards, and it supports other domestic and international technical standards and regulatory bodies. RTCM also provides information to members regarding GMDSS equipment carriage requirements, such as NAVTEX, and communicates with GMDSS users regularly.

1. U.S. Withdrawal from Existing GMDSS Services. Recognizing the stated budgetary reasons for the proposed change, and the fact that no decision has yet been made, the Working Group never the less finds it unfortunate that the U.S. as one of the most prominent members of the IMO and also one of the best able to meet its financial obligations, finds it necessary to withdraw from part of the International NAVTEX Service, and terminating U.S. participation diminishes the whole service. This was clearly the case when the U.S. earlier withdrew from providing the International MF-DSC GMDSS coastal services that provided Ocean Area A2 GMDSS coverage, again due to a budgetary shortfall.

2. Recommend Extending Response Period. The Working Group also feels that the 60 days provided for comment is inadequate to reach many components of the maritime community. SOLAS ships already watch satellite broadcasts of Maritime Safety Information (MSI) but the smaller non-SOLAS vessels that use NAVTEX voluntarily are hard to reach in such a short time through the print media which need a longer lead time to reach their far flung clients. Therefore a comment period of 120 days is recommended. The Working Group is also of the opinion that any shift to satellite broadcasting of coastal MSI should not commence before the U.S. sponsored Iridium system begins IMO approved MSI broadcasting via its SafetyCAST system.

3. Increased Cost to Government of Satellite MSI Broadcasting. While the option of satellite broadcasting may be technically feasible, it would also come at a significant and at present indeterminate recurring cost to both the Coast Guard and the National Weather Service (NWS). The NWS has not considered any additional expenditure. The volume of U.S. coastal NAVTEX broadcasts is believed to greatly exceed the volume of U.S. high seas SafetyNET broadcasting via Inmarsat. Further adding to this cost is the need to duplicate all of the Inmarsat broadcasts on the other new IMO recognized satellite system, Iridium's SafetyCAST.

4. Increased Cost to Vessels to Receive Satellite MSI Broadcasts. Vessels receiving MSI via satellite broadcasts are not charged for the service but must pay for acquiring the necessary equipment This is not considered a problem for SOLAS

¹ RTCM membership is comprised of the maritime stakeholders from the US and foreign governments, marine equipment manufacturers, maritime communications service providers, marine dealers and distributors, US government contractors, technical standards organizations, technical service organizations, marine pilots organizations, marine transportation services, marine insurance providers and many other interested parties in the marine industry in the US and abroad.

class vessels which are already equipped to receive both NAVTEX and Inmarsat SafetyNET broadcasts but smaller voluntary vessels will need to acquire equipment to receive the satellite broadcasts. For comparison purposes the current cost of a basic NAVTEX receiver is around \$750. The estimated cost of Inmarsat-C terminals ranges from \$2500 to \$6500 plus installation and any annual fees involved. The cost of a new GMDSS certified Iridium terminal is unknown but is probably in excess of \$3000 plus installation and an annual fee. It has also been determined that a new GMDSS certified Iridium terminal would be required to receive SafetyCAST broadcasts rather than existing non-GMDSS terminals. These voluntary craft are the most vulnerable and it would be a shame if they decided to opt-out of receiving satellite Maritime Safety Information (MSI) due to the cost.

5. Alternatives to Satellite Broadcasting of MSI. The Working Group has also briefly looked at several alternatives to terminating NAVTEX broadcasting that should be considered but most would require extensive study to determine feasibility and many would appear to be more costly than rehabilitating the NAVTEX system. Instead, we feel that a rigorous cost benefit analysis emphasizing the cost to users should be undertaken.

6. Cost Benefit Analysis Recommended. It does not appear that a cost benefit analysis of the proposed coastal MSI broadcasting options has been conducted and it is strongly suggested that this be undertaken before making a final decision. Any cost benefit analysis should compare the cost of refurbishing and running the existing USCG NAVTEX infrastructure compared with the cost of implementing and running an alternative solution, which should include not only the cost of broadcasting the information over both SafetyNET and SafetyCAST, but also the cost to mariners and especially recreational boaters, of having to purchase new equipment to replace their existing NAVTEX terminals and pay for an annual service plan.

This comment was approved in scope and general approach by the GMDSS Task Force at its meeting on 19 September 2019 and the RTCM at its Board Meeting on 16 September 2019 and refined with final editing by the Working Group of designated representatives of both organizations on 8 October 2019.

Sincerely,

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