

National GMDSS Implementation Task Force
1600 North Oak Street, #427; Arlington VA 22209

5 January 2006

Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

**PETITION TO REQUEST THAT FCC RECOGNIZE EXISTING MMSI
ASSIGNMENTS WHEN ISSUING STATION LICENSES**

The GMDSS Task Force. The National GMDSS Implementation Task Force is chartered by the U.S. Coast Guard to supplement government functions in expediting the implementation of the Global Maritime Distress and Safety System (GMDSS) approved by the International Maritime Organization (IMO). The Task Force membership is broad-based including nearly 1500 representatives of government authorities, commercial vessel owners and operators, recreational vessel interests, training institutions, service agents, manufacturers, trade associations and maritime labor organizations. The Task Force maintains a portion of the Coast Guard web site at www.navcen.uscg.gov/marcomms/ that contains numerous GMDSS Information Bulletins, records of Task Force meetings, and various Task Force letters recommending regulatory action. The Task Force has made numerous recommendations to both the Coast Guard and the FCC, most of which have been adopted.

Background. Recreational Vessels using only VHF Radio and EPIRBs are 'Licensed by Rule' and not required to hold a Station License for domestic operation. Many of these recreational vessels are now using VHF with Digital Selective Calling (DSC) which requires assignment of a Maritime Mobile Service Identity (MMSI) number. In view of the large number of vessels in this category, the FCC authorized BOATUS and Sea Tow to issue MMSI numbers from a block of numbers the FCC set aside for this purpose. This delegation of authority has been working satisfactorily and is of great assistance to the recreational vessels since BOATUS and Sea Tow do not charge for the service which would otherwise cost \$155.00 if the MMSI number was assigned directly by the FCC. Over 25,000 MMSI assignments have been made to date under this relatively new program. It should also be noted that MMSI numbers are allocated to administrations by the International Telecommunications Union (ITU) and that the U.S. requires a very large share of the available numbers. Despite the 'Licensed by Rule' provisions cited above, the FCC Regulations require that vessels going on international voyages, even short voyages to Canada, Mexico, and the Bahamas, hold a Radio Station License issued by the FCC.

The Problem. Recreational vessels which desire to make such international voyages are obliged to apply to the FCC for a Station License. The FCC's Universal Licensing System (ULS) will not accept an MMSI number which has already been issued by BOATUS or Sea Tow and insists in assigning a new MMSI number. This is a burden on the recreational vessels which have to change the MMSI number in shipboard equipment. This usually requires the services of a technician and may require the owner to remove the radio and ship it back the manufacturer. This not only leaves the vessel without a radio for a period of time but the radio must be reinstalled after it has been returned. It is thus no surprise that many boat owners are tempted to ignore the rules requiring the \$155.00 Station License for international voyages since it well known that the Rule is not enforced and appears to serve no practical purpose. The Task Force does not advocate such a solution but points out that the failure to deal with this problem is a strong inducement for the boating public to do just that. An added factor is the complex and inflexible nature of the ULS system which is in itself a challenge for novice boat owners to use successfully. A further complication is that the vessel will be registered with two separate MMSI numbers unless the owner takes the further step of deleting his registration on file with BOAT US or Sea Tow. Furthermore, the situation requiring a change in MMSI numbers is also wasteful of these numbers which are expected be in short supply as a result of new international and domestic regulations requiring assignment of these same MMSI numbers for use with the Automatic Identification System (AIS).

Action Recommended. The GMDSS Task Force hereby petitions the Commission to alter the ULS Program so as to recognize existing MMSI numbers and avoid the wasteful and expensive practice of issuing new MMSI numbers to applicants for Station Licenses.

Approval. This Petition was approved by the National GMDSS Implementation Task Force at its regular meeting on 5 January 2006.

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