

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

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Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington D.C. 20554

**PETITION TO REQUEST THAT FCC AMEND THE RULES TO REQUIRE  
THAT VOLUNTARY USERS OF VHF-DSC RADIOS BE REQUIRED TO  
REGISTER FOR MMSI NUMBERS AND CONNECT A GNSS RECEIVER**

**The GMDSS Task Force.** The National GMDSS Implementation Task Force was chartered by the U.S. Coast Guard to supplement government functions in expediting the implementation of the Global Maritime Distress and Safety System (GMDSS) adopted by the International Maritime Organization (IMO). The Task Force membership is broad-based including over 2500 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/?pageName=MaritimeTelecomms](http://www.navcen.uscg.gov/?pageName=MaritimeTelecomms) 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.** Existing FCC rules CFR 47 Part 80, were recently changed to require that voluntary users of VHF radios watch channel 16 or 70 while underway and not communicating on another channel. This removed the earlier option to be underway but not in service. The Task Force considered this change to be very appropriate as a contribution to the collective safety of all VHF users. The FCC has further strengthened the VHF-DSC system by requiring that all new models of VHF radios (except portables) submitted for certification have DSC capability. The system has been further strengthened by a recent decision to withdraw authority to market VHF-DSC radios conforming to the RTCM SC-101 specification for a radio of minimal capability.

**Recommended Rule Change to Require Registration for an MMSI Number.** The Task Force recommends a further change in the rules to make registration for an MMSI identifier mandatory for all users of VHF-DSC radios. The Task Force makes this recommendation in view of a strong indication that many voluntary users of VHF-DSC radios have failed to register for MMSI numbers rendering the automated distress functionality inoperative. It should also be against the Rules to enter a false MMSI number or a locally generated number not recorded in the master database.

**Discussion of the Requirement for Mandatory MMSI Registration.** The reasons for the user's failure to take these steps to enhance their own safety are unclear but no doubt include the fact that until recently the Coast Guard has been unable to maintain a continuous watch on VHF channel 70 through the shore network. The Coast Guard's new Rescue 21 system, a highly reliable shore network with DSC capability, is now nearing completion along the shores of the continental United States, Great Lakes, inland rivers, and offshore islands. It is now time to reinforce the need to register for MMSI numbers through regulatory action.

**Recommended Rule Change to Require Connection of Installed VHF-DSC Radios to a GNSS Navigation Receiver.**

The Task Force makes this recommendation for mandatory connection of navigation receivers to installed VHF-DSC radios based on Coast Guard statistics which indicate that about 90% of distress alerts received by DSC lack a usable position. With respect to portable VHF-DSC radios, the Task Force strongly recommends any incentive for use of portables with embedded GNSS capability which should also be required for and vessels mandatorily required to carry VHF-DSC and permitted to use portables for this purpose. With VHF-DSC handhelds already on the market it is also important to review FCC policy which exempted new models of handhelds submitted for certification from having to have DSC capability. The Task Force further recommends that new models of VHF-DSC handhelds submitted for certification be required to incorporate an integral GNSS capability.

**Discussion of the Requirement for Connection of a GNSS Receiver to DSC Radios.**

Many users find it difficult to make the connection between DSC radios and the navigation receiver themselves and are reluctant to pay a technician to make the connection for them. This is a significant problem since many of these equipments are purchased from catalogs or on line rather than through a servicing dealer. Considering the immense cost to the Coast Guard to conduct extensive air searches for overdue vessels without reliable position information and the relatively low cost of GNSS receivers, it is high time that connection of navigation receivers be required through regulatory action.

**Further Rule Changes Recommended in Conjunction with Declaration of Sea Area**

**A1.** With the completion of the Coast Guard's Rescue 21 system projected for 2012, it is high time to establish a formal date for declaration of GMDSS Sea Area A1 in the U.S. and formulate appropriate changes to the Rules to give the public ample notice that waivers of VHF-DSC requirements for mandatory vessels will end at a selected date. This date could be as early as 31 December 2012 if the Rule changes are announced by 31 December 2011.

**Discussion of Enforcement Aspects of the Recommended Regulatory Action.** The

Task Force realizes that the FCC is not equipped to enforce these changes but it is important that they be required in order to strengthen the ability of other enforcement agencies such as the Coast Guard to do this. It is also important to require these changes so that voluntary organizations such as the Coast Guard Auxiliary and the U.S. Power Squadrons can effectively reinforce these goals through their training courses and voluntary inspections. The Task Force feels strongly that adoption of these recommendations will strengthen the integrity of the VHF-DSC portion of the national GMDSS Safety and Distress System and contribute greatly to the safety of life at sea.

**Approval.** This Petition was adopted by the GMDSS Implementation Task Force at its regular meeting on 19 May 2011.

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