

U.S. GMDSS TASK FORCE
GMDSS MODERNIZATION INITIATIVE

July 7, 2005

file: gmdss-mod.doc

The GMDSS Task Force is considering a new initiative looking toward modernization of the Global Maritime Distress and Safety System (GMDSS).

The following is a listing of GMDSS concepts where the Task Force has considered changes. Task Force recommendations, which are in draft form at this stage, are in italics. We plan to seek Task Force approval of these recommendations at our 11 August meeting. Once the Task Force approves recommendations, the chairman will send correspondence on each suggestion separately to the appropriate agency.

I. Very High Frequency VHF issues

Issues:

1. When will the USCG achieve final operational capability (FOC) for DSC? *The Task Force recommends continued urgent attention to this issue.*
2. Should the Task Force recommend publication of Area A1 on a regional basis such as the Gulf of Mexico, as capabilities come on line? *The Task Force recommends declaration of sea areas A1 as major regions are completed.*
3. Should the Task Force recommend a phase out date for VHF radios that do not have a DSC capability? *Yes. The Task Force recommends consideration of a phase out date be established after the USCG declares area A1 for CONUS.*
4. Should the Task Force press for indefinite extension of Channel 16 requirements? *Yes.*
5. Should RTCM update the SC-101 VHF-DSC standard to International Class D? *The Task Force and RTCM have recommended a class D rulemaking process to the FCC; the Task Force recommends this process be expedited. Further, it recommends a testing procedure for the alerting feature be included.*

II. New GMDSS Related Domestic Regulatory Initiatives

Issues:

Should the Task Force recommend:

1. Updating domestic Fishing Vessel requirements to emulate IMO recommendations? *This needs further study prior to a recommendation. However, the Task Force recommends that the DSC feature be required where VHF, MF, HF radios are mandated.*
2. Extension of laws like the Hawaiian Law requiring VHF or EPIRB on vessels going 1 mile offshore? *The Task Force believes this is a Federal Government*

issue where uniformity is desirable; the Federal Government should act here, and the states should not. However, the Federal Government has not acted; so state actions are better than nothing. The Boating Safety Advisory Committee has passed a resolution calling for a model law for states that wish to act on this issue so there can be uniformity. The Task Force supports enactment by states of the National Association of State Boating Law Administrators' model law by states. Further the Task Force recommends properly registered PLBs be accepted as satisfaction of this requirement.

3. Minimal training for users of GMDSS-like radio systems? *Yes. A minimal training requirement is the desired outcome, but if this cannot be implemented, the Task Force will continue to recommend voluntary training programs.*
4. Extension of selected GMDSS services to the Great Lakes in coordination with Canada? *Yes.*
5. Elimination of Rules, which are not enforced (i.e. Station Licenses to visit Canada)? *Yes. Note: Task Force members are invited to identify candidate rules.*

III. Maritime Safety Information (MSI)

Issues

1. Do advancing technologies such as web-based systems make a demand “pull” approach viable for some applications? *Yes; the Task Force notes progress is being made in this area and recommends it be continued.*
2. How do we reconcile the NAVTEX throughput limitations vs. the volume of data for broadcast? *The Task Force notes this is a continuing concern with two possible alternatives. Lower power NAVTEX stations could be implemented or the amount of material for broadcast could be reduced.*
3. Should we recommend mandatory monitoring of NOAA VHF Coastal Weather broadcasts by domestic craft? *The broadcasts are continuous; the Task Force recommends periodic monitoring be encouraged in training and other publications. Further the Task Force recommends users equip themselves with systems having an alarm feature for receipt of alarm broadcasts.*

IV. Satellite Services

Issues

1. Should the Task Force express concern about new systems without Distress Buttons and Priority Routing? *The Task Force recommends satellite systems joining the GMDSS have distress button capabilities and priority routing available with two independent actions required for activation to reduce false alarms.*
2. Are 4 levels of priority really needed for modern systems? *While this issue needs further study, this requirement is probably outdated; two levels—distress and routing should be sufficient; future regulatory work should gradually incorporate this change.*
4. Inmarsat Mini M and some other non-Inmarsat systems have good potential for satisfying safety needs for US non-SOLAS mandatory vessels, and could be used

- by SOLAS vessels if declared equivalents. *The Task Force recommends expeditious acceptance of alternate systems that are suitable for satisfaction of these requirements*
5. Should all satellite systems have to perform the same functions? *No. Onus is on operators to get what is required.*
 6. Should the Task Force encourage Alternative Mobile Satellite Systems for use in the GMDSS or for mandatory domestic vessels? *Yes. Overwhelming issue is what's best for maritime safety. What do I want out there on the ship in distress or in my lifeboat? Make sure this is the focus.*

V. Medium and High Frequency Digital Selective Calling (DSC)

Issues

1. What is the best way forward for HF and MF DSC distress systems? The Task Force notes ITU-R is studying this issue in preparation for the 2007/8 World Radio Conference.

VI. Record Communications and Public Correspondence

Issues:

1. What if anything needs to be done to update maritime systems and approaches for public correspondence and record communications? *The Task Force notes that this is another reason to support additional satellite systems for the GMDSS as well as other systems using HF for example.*

VII. Lifesaving Appliances

Should the Task Force recommend:

1. Evaluation of the effectiveness vs. cost of SARTs for scene of action locating? *Yes. Alternatives include satellite systems and some form of AIS.*
2. Should future EPIRB systems contain a return path so that EPIRB alerts can be acknowledged? *Yes if possible.*

VIII. Should GMDSS Oversight be Broadened to Include other IMO Mandated Electronic Systems

Issues:

Should the Task Force recommend the following systems come under the GMDSS?

1. Ship Security Alerting Systems (SSAS) to maintain linkage of Security and Safety considerations? *Yes. Provided, however, the provisions of IMO Resolution A.888 (21) will not be imposed as the approval process.*
2. Automatic Identification Systems (AIS)? *Yes.*
3. Voyage Data Recorders (VDR)? *No.*
4. Long Range Identification and Tracking Systems (LRIT) to maintain linkage of Security and Safety considerations, and should two-way communications capability be added? *Yes. Provided, however, the provisions of IMO Resolution A.888 (21) will not be imposed as the approval process.*
5. Long Range Navigation Receivers and GMDSS interconnect rules? *Yes.*

Note: In a perfect world, some of these systems should be incorporated into the GMDSS, but such a move involves IMO issues regarding its subcommittees and a host of other issues. In the meantime, the Task Force recommends those working these issues review GMDSS requirements for reserve power, testing and other issues to ensure they are considered.