

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

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

**PETITION TO REQUEST THAT FCC ADOPT NEW POLICIES AND
PROCEDURES REGARDING MMSI ASSIGNMENTS**

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 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, Sea Tow, the U.S. Power Squadrons and others 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 the aforementioned registration agents do not charge for the service which would otherwise cost \$160.00 if the MMSI number was assigned directly by the FCC. Over 40,000 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. It is also important that management of MMSI numbers be tightened to avoid duplication and to recycle discontinued numbers

Wasteful Registration Procedures Assign New MMSI to Vessels Requesting a Station License and Burden the Applicant To Pay a Service Fee to Change.

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 one of the registration agents 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 \$160.00 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 ignoring the rules 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

the registration agent. Furthermore, the situation requiring a change in MMSI numbers is also wasteful of these numbers which are expected to 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). As mentioned earlier, the Task Force considers recycling of discontinued MMSI numbers important to effective management.

A Further Problem if the Vessel does not keep its Station License. In a related manner, most recreational vessels which acquired a Station License before the ‘Licensed by Rule’ procedure was adopted, will not renew the Station License on expiration if they have no plans for international cruising. They could continue to use the MMSI number assigned by the FCC but if they affiliate with one of the registration agents, they must be assigned a new MMSI number from the blocks allocated to those agents. This entails the same burden on the boat owner as described above relative to the cost of having a technician change the embedded number and may result in duplication if the FCC maintains the original listing. The solution recommended by the Task Force is to permit continued use of the FCC assigned MMSI and transfer of that number to the block of numbers managed by one of the registration agents. Since periodic validation of MMSI assignments is the only way to eliminate duplication and maintain an accurate database for Search and Rescue purposes, the Task Force feels that all MMSI assignments should be managed by the FCC or one of the designated registration agents.

A new Problem Related to Expanded Vessel Descriptive Data. The FCC agreed to require additional vessel descriptive data on Station License applications to enhance search and rescue operations in compliance with a new IMO mandate. Previously licensed vessels should also be requested to provide the additional data when applying for a renewal of their license. It is requested that the FCC take action to request the additional data rather than issuing a routine renewal without updating the database.

A New Problem Concerning Database Validation. The Task Force review recognized the need for an accurate and up to date database of MMSI numbers for Search and Rescue and Homeland Security purposes. In a review of current MMSI assignments many duplicate and inactive entries were noted. The Task Force is mindful of a similar GMDSS implementation problem which was successfully addressed by the National Oceanic and Atmospheric Administration (NOAA) in managing the registration of EPIRBs, PLBs, and ELTs. NOAA has succeeded in keeping their database up to date through periodic contact with the registrants. Since the fundamental database of MMSI numbers is the FCC's record of Station Licenses, it is strongly urged that the FCC undertake an appropriate validation program to eliminate duplications and inactive assignments. The FCC has already delegated a portion of the MMSI assignment process to the afore-mentioned registration agents. Those registration agents are already charged with the responsibility of maintaining validation of the number blocks issued to them. The FCC is also responsible for issuing blocks of numbers to the National Telecommunications and Information Administration (NTIA) for reissue to Federal Government Licensees and the Task Force expects that a similar validation procedure will be employed by government agencies to maintain validity of federal assignments.

Action Recommended. The GMDSS Task Force hereby petitions the Commission to alter the ULS Program so as to recognize existing MMSI assignments and avoid the wasteful and expensive practice of issuing new MMSI numbers to applicants for Station Licenses who already have an MMSI assigned by a designated registration agent. The Task Force further recommends that the ULS Program be modified as necessary to enable an FCC assigned MMSI to be transferred to a block managed by a designated registration agent or any other assignment agency which may be created, when a

recreational vessel decides not to renew the Station License. The Task Force further recommends that a validation program be enacted by the FCC to minimize duplication and inactive MMSI assignments in the official Station License records. Finally, the Task Force recommends that positive management initiatives be undertaken to ensure recycling of MMSI numbers to meet the growing need for MMSI numbers, especially in the U.S. which requires a disproportionate share of the limited numbers available to the international community to meet our continuing needs for safety at sea and our enhanced needs of homeland security.

Approval. This Petition was originally adopted by the GMDSS Implementation Task Force at its regular meeting on 5 January 2006. It was withdrawn on 26 January 2007 in order to include additional policy recommendations identified by a broad based MMSI Policy and Procedures ad hoc group of the Task Force. The expanded Petition was approved by the Task Force at its regular meeting on 10 May 2007.

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