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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FILE

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In the matter of )  
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Amendment of Parts 80 of the )  
Commission's Rules to include minimum )  
requirements for Digital Selective )  
Calling in Maritime Ship and Coast )  
Station Equipment sold in the )  
United States )  
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AUG 3 1992  
RM-8831  
FCC MAIL BRANCH

To: The Commission

SUPPORT OF THE NATIONAL MARINE ELECTRONICS  
ASSOCIATION TO THE PETITION FOR RULEMAKING

The National Marine Electronics Association (NMEA)  
respectfully submits this it's comments to support the above  
referenced petition for rulemaking by the United States Coast  
Guard, U.S. Department of Transportation.

I.  
Introduction

1. The National Marine Electronics Association (NMEA) is a  
trade association comprised of approximately 350 members who are  
the manufacturers and retail servicing dealers of Marine  
Electronic Communications and Navigation Equipment.

2. The diverse membership of NMEA serves the needs of the  
entire maritime industry. The recipients of the products and  
services of the members of NMEA are the owners and operators of  
the largest ocean-going vessels to the smallest recreational  
vessels. This diverse industry responds to the needs of all  
mariners. Their products and services are more creative than

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simply reactive, fostered by industry awareness of the hazards of mariners and their vessels and the need for communications and navigational devices to ensure their safety.

3. During the latter part of 1991 and in early 1992, the NMEA informed it's members of the pending Coast Guard petition to the FCC. Discussions were conducted with communications equipment manufacturers regarding engineering and production timing and the cost impact to provide a minimal DSC capability to newly designed maritime radios. Subsequently, a list of all known manufacturers or suppliers of maritime radios in the United States was furnished to the Coast Guard to permit them to solicit comments and information pertaining to the petition.

## II. Comments

4. The Coast Guard in it's petition notes that as of 1 February 1999, those vessels subject to the SOLAS Convention and the requirements of GMDSS, will no longer manually monitor VHF channel 16 and 2182 KHZ on MF/HF maritime radios. The Commission, in their Notice Of Proposed Rulemaking on GMDSS, noted that the present manual system is dependent on a continuous watch on distress frequencies. Furthermore, in the Report and Order on GMDSS, under Section III Discussion, sub-section C, paragraph 8.44, the Commission notes that their proposal is to eliminate the ships watch on 2182 KHZ and VHF Channel 16 in agreement with the international GMDSS provision,

stating that ship's equipped with DSC will use DSC frequencies in lieu of 2182 KHZ or VHF Channel 16 to communicate when passing or for distress communications.

5. The petition expresses concern that once GMDSS is fully implemented, the mandatory equipped SOLAS vessels using DSC and no longer manually monitoring distress and safety frequencies will not be able to be contacted by those vessels not equipped with DSC such as fishing vessels, pleasure craft and all other non-compulsory vessels. The NMEA has a much greater concern than the Coast Guard's concern for certain vessels not being able to communicate. This concern further supports the petition.

6. The NMEA concern is for the hundreds of thousands of vessels and mariners excluded from a modern and automated distress system. The GMDSS, and under the conditions of its implementation by the Commission in the United States, only addresses those compulsory vessels of 300 gross ton and over and certain passenger vessels. Various estimates of U.S. vessels in those categories range from 350 to 500 vessels. The initial reaction from the U.S. Marine Electronic industry with approximately 40 maritime radio manufacturers or distributors to such a limited market was not conducive to any effort to produce new radios with DSC capability.

7. Being designated as the SAR organization in the United States, the U.S. Coast Guard plans to spend more than five million dollars to install and equip their facilities and rescue units with DSC and automated distress monitoring to meet the

requirements and to provide this service to those limited number of SOLAS vessels.

8. Industry estimates indicate that there are more than 10 million registered vessels of all categories in the United States. Conservative estimates show that almost one million of these non-compulsory vessels are equipped with one or more maritime radios. The manufacturer members of NMEA have already indicated that, if the Commission allows the minimal requirements for DSC as contained in the petition, the end-user cost is minor and low cost DSC radios can be manufactured. If the petition and it's concept somehow fails, the hundreds of thousands of mariners excluded by the GMDSS will be denied the benefit of a costly, efficient and automated distress system and will only be provided with an out-dated manually monitored system that may not be monitored.

9. The petition briefly mentions the problem of false or hoax distress messages. The Commission has had an open agenda item for several years regarding a requirement for Automatic Transmitter Identification System (ATIS) for transmitters. The minimal DSC requirement in the petition recommended by Radio Technical Commission for Maritime Services (RTCM) SC101, provides for self-identification. This then would serve the concern of the Commission for ATIS and the Coast Guard concern for false distress messages.

10. The Coast Guard in it's petition is recommending an effective date of 1 February 1997 for all maritime radios sold

in the U.S. to be required to include DSC. The petition further suggests that the Commission consider an earlier date. The NMEA manufacturer members have already indicated they can have low-cost DSC radios available sooner than 1997 and actually, because of the Coast Guard efforts and with the interest generated by the intended petition, will begin producing low cost DSC radios in the near future. In addition, several countries have enacted regulations to require their vessels to meet GMDSS regulations as early as 1995. In the petition, the Coast Guard stated their plans to begin installing MF DSC services in 1994 and VHF DSC services in 1995. The NMEA recommends that the wording for the requirement date and the date should be changed. Citing the Commission's Final Rule, PR Docket No. 90-26 which requires an automatic timing device to deactivate VHF ship transmitters and the language of amended Part 80.203(C) of the Commission's Rules, the NMEA respectfully asks the Commission to consider requiring the petitioned minimal DSC for all radios "manufactured in or imported into the United States on or after February 1, 1995 or are initially installed on or after February 1, 1996". This requirement will not create a burden on manufacturers and will allow mariners the availability of DSC to communicate with SOLAS vessels that equip with DSC sooner than 1999 and the use of the SAR network in the U.S. as soon as it becomes available.

11. For the reasons stated herein, the National Marine Electronics Association fully supports the Coast Guard petition

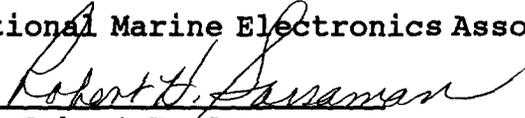
and urges the commission to expedite it's procedures to issue a Notice of Proposed Rulemaking.

The NMEA appreciates the opportunity to furnish comments on this and other proceedings before the Commission.

Respectfully submitted

National Marine Electronics Association

by

  
Robert H. Sassaman

Executive Director

Date this 29 day of July 1992.