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

In the Matter of
Radio Technical Commission for Maritime Services

Petition for rulemaking to rewrite Part 80 of the Commission’s rules for Stations in the Maritime Services

February 16, 2016

PETITION FOR RULEMAKING

The Radio Technical Commission for Maritime Services (RTCM)¹ hereby requests the Commission to commence a rulemaking to rewrite the regulations at 47 CFR Part 80, comprehensively updating and streamlining the rules for Stations in the Maritime Services.

¹ The RTCM is a non-profit organization whose objectives include studying and preparing reports on maritime electronic navigation and telecommunications practices. Our focus is on needs and technologies with a view toward improving efficiency and capabilities of maritime electronic navigation and telecommunications services, suggesting ways to keep rules and regulations to the minimum essential for effectiveness, and making recommendations on important issues. Established as an advisory committee by the U.S. government in 1947 to support technical decision-making in the area of maritime radiocommunications, RTCM is now a membership organization that supports and encourages needed improvements in maritime communications and electronic navigation. RTCM technical standards have been widely incorporated in the FCC Part 80 and 95 rules, they have served as international standards, and they have been used as the basis for many more ITU and IEC international technical standards used in the maritime services.
Services. RTCM has worked closely with the U.S. Coast Guard and other maritime organizations over the past few years to prepare this Petition for Rulemaking and the attached proposed regulatory revisions.

The paramount goals of this Petition for Rulemaking are to enhance maritime safety, promote the efficient use of the maritime radio spectrum, and to the extent consistent with these first two objectives, remove unnecessary regulatory burdens on the users and manufacturers of maritime radio equipment. The proposed rule revisions would also reconcile Part 80 of the Commission’s rules with international standards where doing so will not undermine domestic maritime practices and U.S. regulatory objectives.

**Regulatory Background**

On January 16, 1992, the FCC adopted rules to implement GMDSS in the United States, requiring the installation of GMDSS equipment by February 1, 1999. Additionally, the Commission incorporated into its rules international equipment standards promulgated by the IMO, the International Telecommunication Union (ITU), the International Electro-technical Commission (IEC), and the International Standards Organization (ISO).

Since 1992, many of these international standards have been revised to clarify, improve, and update the GMDSS requirements. In light of these revisions, on March 17, 2000, the Commission issued a *Notice of Proposed Rule Making* in WT Docket No. 00-48, in which it proposed to revise Part 80 of its rules to reflect changes in international
standards and regulations; delete or modify rules affected by full implementation of GMDSS; and delete or modify any other regulations deemed unnecessary or in need of clarification. The Commission went on to adopt many of these proposals in this, the last major rewrite of Part 80 of the FCC’s rules.

Since the last FCC revision of Part 80 of the rules, these standards and relevant maritime radio technologies have undergone additional changes, revisions and advances. This Petition for Rulemaking is intended to revise Part 80 in response to these changes.

**Summary of Specific Regulatory Revisions**

By this Petition, changes have been proposed throughout Part 80 to simplify regulations and to eliminate equipment and procedures which are no longer used. For example, elimination of 2182 kHz and radiotelegraphy are two examples of requirements proposed to be eliminated.

Submitted below is a summary and overview of some of the most significant changes proposed to Part 80 of the FCC’s rules.

**§80.7 Incorporation by reference.** Part 80 regulations include many incidences of references to technical standards, many of which are frequently routinely updated. This section has been rewritten to allow updating of all standards referenced in Part 80 to be accomplished in this section only. This is intended to simplify the rulemaking process necessary whenever the standards incorporated in this Part are routinely updated by their
respective standards organizations, and to enable these references to be kept up to date.

Several standards references have been proposed for updating, including the newly updated *RTCM 11000.4 Standard for 406 MHz Satellite Emergency Position-Indicating Radiobeacons (EPIRB)* requiring an integral electronic position fixing capability (e.g. GPS) and allowing an AIS homing beacon.

§ 80.16 Assignment and use of numeric identities including maritime mobile service identities (MMSIs). Use of the nine digit MMSI identity has become ubiquitous due to the widespread use of AIS and DSC. Nevertheless, the obtaining, application and maintenance of the MMSI and its database have become cumbersome and confusing; registered identities are often inaccurate. To help simplify MMSIs and its processes, Part 80 regulations concerning MMSIs have been clarified and consolidated into a new section.

§ 80.225 Requirements for selective calling equipment.

In updating standards to conform to ITU-R Rec M.493-14, it is proposed in (a)(1) that maritime radios include an integral position-fixing receiver (e.g. GPS). Experience has shown that approximately 90% of DSC distress transmissions do not include an associated position. Lives are saved when such alerts include a position from radios such as handhelds which have an integral GPS. The costs associated with GPS receivers have been reduced so substantially over the past few years that it is now practical to include them in virtually all maritime radios.
(a)(2) Proposes that DSC-equipped VHF handheld radios meet the *RTCM 10150 Standard for VHF-FM Portable Marine Radiotelephone Equipment with Digital Selective Calling (DSC) and Global Navigation Satellite System (GNSS) Location Function*. Since this standard effectively replaces the dual receiver requirement of IEC 62238, there should be no cost impact to DSC-equipped VHF handhelds.

(a)(5) Proposes that DSC radios be capable of resetting and modifying the MMSI code by use of a personal identification number, password or similar means made available to a servicing agent. It further proposes that DSC equipment include an IEC or NMEA data interface which includes the DSC and DSE data interface sentence or its equivalent.

§80.304 *Watch requirements during silent periods* and related provisions. Deletes the requirement for watchkeeping on 2182 kHz by ship and by public coast stations.

§ 80.361 *Frequencies for narrow-band direct-printing (NBDP) and data transmissions*. Inclusion of provisions for VHF-FM Digital Small Message Services proposed by RTCM in an earlier rulemaking petition.

§ 80.401 *Station documents requirement*. Updated Table of required documents and publications for clarification.

**Subpart Q  Automatic Identification System (AIS) Stations and Equipment**

This proposal would move all AIS provisions to a new Subpart Q. Also included are additional provisions for AIS SARTs, AIS ATONs and repeaters, and Class B-SOTDMA
devices. Also added provisions for use of AIS application-specific messages. Clarified requirements for station licenses, data accuracy, AIS operations and AIS testing.

§ 80.905 Vessel radio equipment and related provisions. Included changes to US Coast Guard declaration of Sea Area A1 and decision not to implement Sea Area A2.

Subpart V—Emergency Position Indicating Radiobeacons (EPIRB's)

Revisions to this Subpart are intended to clarify which EPIRB devices are allowed and not allowed. For example, 121.5 MHz ELTs used in the maritime services are expressly disallowed. Proposed AIS SART be allowed as an EPIRB homing beacon in place of or in addition to 121.5 MHz. Updated and clarified EPIRB registration requirements.

Added §80.1062 Requirements for Testing and Maintenance of 406.0-406.1 MHz EPIRB stations. In updating the RTCM standard reference to RTCM 11000.4, included are requirements for integral position and allowed use of AIS SART for locating.

Subpart Y—High Speed Craft Radio Installations

Propose a new Subpart for high speed craft, moving the competitive bidding regulations to Subpart X. This new Subpart is applicable to vessels that are subject to the 2000 HSC Code, as incorporated at Chapter X of SOLAS.

Part 2, § 2.303 Other forms of identification of stations.

Proposes that outdated maritime identification provisions be deleted. Added MMSIs, the use of which has become ubiquitous in the maritime services.
Conclusion:

RTCM urges the FCC to amend its Part 80 rules as recommended.

For the Radio Technical Commission for Maritime Services

R. L. Markle
President

Attachment: Proposed revision of 47 CFR Part 80