

Date: May 31, 2016
To: Federal Communications Commission
From: Rich Beattie
Re: Proceeding RM-11765 – RTCM Petition for Changes to 47 CFR Part 80

With regards to the aforementioned proceeding, I would like to suggest the following changes to Part 80 in addition to voicing my support for the RTCM's work which has resulted in this proceeding.

47 CFR 80.1005 Inspection of Station

With regards to Bridge to Bridge Inspections and, specifically, to the expression used "from time to time" as an inspection period for vessels not also required to be primarily inspected under other requirements such as Subparts S, T, and W, I would submit that the inspection period be defined as two (2) years rather than the undefined interval of "from time to time".

This would fall in line with the proposed Small Passenger Vessel inspection frequency as a matter of consistency with regards to the longest radio inspection interval being currently proposed in Part 80 for regulated vessels. As a result, this would give Owners, USCG Inspectors as well as Radio Surveyors positive guidance as to when such inspections are to occur.

47 CFR 80.59 Compulsory Ship Inspections

In October of 2007, the IMO published its Guidelines for Annual Inspections of AIS - MSC.1 Circular 1252. Those guidelines stated that the inspections should be carried out by "a qualified radio inspector authorized by the Administration".

I would submit that a new section (e) be added to 47 CFR 80.59 stating the following:

"All vessels subject to the requirements of Subparts S, T, U and W are required to undergo an inspection of their AIS units at the same time as the compulsory Radio inspections.

In the case of Subpart W vessels, this will be an annual inspection, for Subpart T vessels the inspection will be every 13 months and for Subpart S & U vessels, that inspection will be every two (2) years.

The IMO Guide MSC.1 Circular 1252 is to be used as the instruction and inspection form for such AIS inspections. This completed inspection form that is part of that Circular is to be signed by the Radio Inspector and a copy left onboard with the Master. Further, a notation will be made in the Radio Logbook that such an AIS Inspection took place along with the results thereof.

Respectfully Submitted

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