

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of)

Amendment of Part 13 and 80 of the)  
Commissions Rules Concerning Maritime)  
Communications)

WT Docket No. 00-48 and 02-102  
RM-9499

**Comments By  
Recreational Boating Association of Washington**

Submitted August 15, 2002

The Recreational Boating Association (RBAW) comments are in response to the Further Notice of Proposed Rulemaking contained in WT Docket No. 02-102 and refer to specific paragraph numbers of WT Docket 02-102.

Paragraphs 109 and 110. Voluntary Restricted GMDSS License.

It is hard to determine at this time what the volume of false distress and unnecessary all station calls will be when many recreational vessel operators begin using VHF-DSC. We want to recommend to the Commission that a provision be established to give recognition to those vessel operators that voluntarily complete an examination covering VHF and VHF-DSC operating procedures. Adoption of the proposed examination procedures could be used in the future if it becomes necessary to require operator qualifications due to excessive false distress or all station calls. This would relieve the FCC of the burden of issuing a voluntary restricted GMDSS license.

RBAW recommends that Part 13 and/or Part 80 be revised to include:

Commission authorization for the Public Safety and Private Wireless Division, Wireless Telecommunications Bureau, to enter into Memorandums of Agreement to permit the US Coast Guard Auxiliary, US Power Squadrons, and other organizations to issue Certificates of Completion of an examination covering VHF and VHF-DSC operating procedures.

Completion of such examinations should also be an optional method to meet the requirement for a Restricted Radiotelephone Operators Permit.

Paragraph 115. Distress Frequency Signals

We concur with the amendment to Section 80.203 proposed by the USCG.

Paragraph 117 and 118. Use of Channels 75 and 76 for Port Operations

RBAW recognizes the need for additional Port Operation Frequencies and concurs with the USCG recommendation for the use of Channels 75 and 76. We also concur with the designation of Channel 22A as "Liaison and Safety Broadcasts, U.S. Coast Guard".

Paragraph 119. Digital Selective Calling Equipment

RBAW concurs with proposed Section 80.225 submitted by the USCG. We recommend that any existing equipment be grandfathered.

We are very concerned with the masking and interruption of communications by DSC Audio Alerts where instant and uninterrupted communications are required. Some examples are:

Bridge to Bridge and VTS Communications.

It is common and recommended practice that during periods of restricted visibility, voluntary vessels in this area maintain a watch on the VTS Channel for nearby vessel traffic and real time visibility reports.

Marine Event Communications.

Arranging moorage for a large number of vessels in a short time period.

We therefore recommend that the proposed Section 80.225(i) become effective at an early date.

Paragraph 121. INMARSAT-E EPIRBs

We concur with the recommendations set forth in Paragraph 121 concerning the use of IMARSAT-E EPIRBs.

Paragraph 130. Tabular Listing of Part 80 Frequencies

Most users of SSB radios are using the SSB Voice Frequencies. We therefore recommend that the carrier frequency continue to be the frequency listed.

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Respectfully submitted,

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