ACR Electronics, Inc.
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November 10, 2006

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

In the Matter of	)	
	)	
Amendment of the Commission's Rules Regarding Maritime Automatic Identification Systems	)	WT Docket No. 04-344
	)	
Petition for Rule Making Filed by National Telecommunications and Information Administration	)	RM-10821
	)	
Emergency Petition for Declaratory Ruling Filed by MariTEL	)	
	)	
Amendment of the Commission's Rules Concerning Maritime Communications	)	PR Docket No. 92-257

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COMMENTS OF ACR ELECTRONICS

ACR Electronics, Inc. respectfully submits these Comments in response to the Notice of Proposed Rulemaking published in the Federal Register on October 12, 2006 (71 FR 60102).

ACR Electronics is a leading manufacturer of marine electronic equipment, including Class A Automatic Identification System (AIS) equipment. With the acquisition of Nauticast in 2003, ACR has a wealth of expertise on AIS equipment. We are currently developing Class B AIS equipment.

Satellite AIS – Inland Areas

ACR Electronics agrees with the Commission's decision that Channels 87B and 88B be reserved for exclusive AIS use in maritime VHF Public Coast Service Areas (VPCSAs). Further, ACR feels strongly that Channels 87B and 88B should also be reserved for exclusive AIS use in all inland VPCSAs where navigable waterways exist. In narrow, obstructed, or winding waterways, the AIS system provides vessel operators the ability to "see" around islands and bends in rivers where radar can not reach, significantly improving navigational safety. In order to eliminate the need for redundant equipment (thereby reducing costs), avoid confusion, and possibly reduce accidents due to operator error, it is important that there is single, seamless AIS system covering all navigable waterways. Thus, for the purposes of navigational safety, Channel 87B is needed for exclusive AIS use in all inland VPCSAs where navigable waterways exist. The potential for satellite monitoring of AIS transmissions is another reason why Channel 87B should be reserved for exclusive AIS purposes throughout all areas of the U.S.

AIS Base Stations

ACR Electronics feels that certification of AIS base stations should be based on compliance with IEC 62320-1. The use of this international standard will result in AIS base stations being available quicker and at a lower cost than if a different (undeveloped) standard were used. In order to maintain a secure AIS system, ACR feels that AIS base stations should only be owned and operated by or on behalf of government agencies and port authorities responsible for waterway management. It's possible that private entities such as marinas and terminals could benefit from AIS information, but this can be accomplished through the use of receive-only AIS equipment, without using base stations.

Class B AIS Shipborne Equipment

ACR Electronics strongly supports the Commission's decision to amend Part 80 of CFR 47 (Title 47 of the Code of Federal Regulations) to incorporate by reference IEC 62287-1 and provide for the certification of Class B AIS equipment that complies with this standard. This is the most effective method of meeting the Commission's goal of ensuring that AIS is deployed widely, quickly, reliably, cost effectively, and in a manner that will maximize its capabilities. Because IEC 62287-1 is already published, the time required to develop a different standard is eliminated. Also, manufacturers will be able to sell Class B AIS equipment sooner and at a lower cost due to the elimination of the need to meet an additional standard. ACR recommends that the Commission consider requiring persons that sell and install Class B AIS units to ensure that the static data, including the MMSI, is correctly entered. With respect to the MMSI, it should be noted that IEC 62287-1 requires that Class B AIS equipment not transmit unless an MMSI different than the default is entered (para. 6.5.1.1) and that the user is not able to alter the MMSI once programmed (para.6.7.2).