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### COMMENTS OF AMERICAN PILOTS' ASSOCIATION ON NOTICE OF PROPOSED RULES REGARDING MARITIME AUTOMATIC IDENTIFICATION SYSTEMS [WT Docket No. 04-344; FCC 06-108]

November 13, 2006

The American Pilots' Association (APA) submits the following comments on the Notice of Proposed Rulemaking in the October 12, 2006 *Federal Register* by the Federal Communications Commission on issues pertaining to maritime Automatic Identification Systems (AIS) and related matters.

The APA is the national association of the maritime piloting profession. Its members are the pilots of ocean-going vessels moving in international trade in the ports and waterways of the United States. This membership includes virtually all of the state-licensed pilots in the 24 coastal states as well as all of the US pilots operating in the Great Lakes system under authorization by the Coast Guard. APA member pilots use, and have considerable expertise in, AIS and all other forms of modern navigation technology.

Although the APA members have an interest in all of the issues identified in the Notice, these comments address the question whether VHF channels 87B and 88B should be reserved for AIS use on a nationwide basis, not simply in the nine maritime VHF public coast service areas (VPCSAs). The APA feels strongly that 87B as well as 88B should be reserved for AIS everywhere in the US, including inland VPCSAs. That is a crucial step in building a truly nationwide AIS system that meets international standards and provides the greatest possible benefit to navigation safety.

In many places in US waters, ocean-going vessels meet and must interact with inland vessels. Many of those inland vessels currently have AIS or will eventually be required to use AIS. All vessels that pilots must meet should have the same AIS setup, including AIS VHF channels. AIS-equipped vessels should be able to "see" all other AIS vessels in its vicinity, and a single set of designated channels is necessary for that purpose.

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In its earlier Notice of Proposed Rulemaking in this proceeding, the FCC proposed allowing 87B to be used for non-AIS in inland waters. Because AIS requires two VHF channels to operate as intended, vessels in those waters with AIS would have to use a designated alternative to 87B for its second AIS channel. Although those vessels could switch from the alternative to 87B when entering a coastal VPCSA (and then switch back to the alternative when leaving the coastal area), that option is problematic. If done manually, that would impose an additional burden on the vessel's bridge crew. It might not be done properly or not be done at all in some cases. Near the boundaries between the coastal and inland areas, a vessel will necessarily lose some of its AIS reception because of vessels on the other side of the boundary transmitting one of its AIS signals in a different AIS frequency. In addition, we understand that manual switching is not possible with Class B AIS units.

Channel switching can also be done remotely by government-operated base stations that can "command" AIS units to switch to the designated AIS channels in an area. This would require a large, extensive network of base stations in both coastal and inland areas. Although the Coast Guard is planning a national AIS program, it is not at all clear that it would ever have such an extensive base station network. Nor does it seem cost-effective for the government to build base stations solely for the purposes of switching vessels' AIS transmission frequencies.

Use of 87B for non-AIS signals in inland areas also can interfere with AIS in coastal VPCAs. Skip or "ducting" can send VHF signals in this frequency band hundreds of miles. An APA member pilot from Tampa Bay recently reported that he can often hear 87B signals from Port Canaveral, Jacksonville, and Miami. When conditions are right, Tampa pilots hear signals from Charleston and Key West. If such signals were coming from a non-AIS use in an inland area, the performance of the AIS system used by the pilot could be degraded.

It would be far better to have a nationwide, seamless maritime AIS system with the same two channels, 88B and 87B, as the required AIS channels, consistent with the international designation. If AIS is to reach its potential as a significant navigation safety tool, a seamless, nationwide system is required. The APA recommends that both 88B and 87B be reserved exclusively for AIS use throughout the nation.