



**The American Waterways Operators**  
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Jennifer A. Carpenter  
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Docket Management Facility  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: Maritime Communications  
(WT Docket No. 04-344; FCC 06-108)

Dear Sir or Madam:

The American Waterways Operators (AWO) is the national trade association for the tugboat, towboat, and barge industry. Our industry consists of nearly 4,000 tugboats and towboats and over 27,000 barges of all types. These vessels operate on the inland and intracoastal waterways, the Great Lakes, and the Atlantic, Pacific, and Gulf coasts. Pursuant to Coast Guard regulations implementing the Maritime Transportation Security Act (MTSA) of 2002, towing vessels operating in Vessel Traffic Service System (VTS) zones have been required to carry Automatic Identification System (AIS) equipment since December 31, 2004. Other towing vessels over 26 feet and 600 horsepower will also be subject to AIS carriage requirements under pending Coast Guard regulations to complete implementation of the MTSA mandate.

The FCC has requested comment on whether VHF channels 87B and 88B should be reserved for exclusive AIS use throughout the nation, in inland Vessel Public Coast Service Areas (VPCSAs) as well as the existing nine VPCSAs. AWO supports reserving these two channels for nationwide AIS use for the following reasons:

First, the reservation of channels 87B and 88B for exclusive AIS use nationwide is important for navigational safety. AIS is a valuable navigational safety tool not only in coastal waters, but also on inland waterways. When connected to radar displays, AIS can identify every radar target that is also equipped with AIS, and when connected to electronic chart displays, AIS can plot the position of every AIS-equipped vessel in VHF range. In narrow, obstructed or winding waterways, AIS has the ability to “see” around islands and bends in rivers where radar cannot reach.

The Tugboat, Towboat and Barge Industry Association



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Furthermore, many of the vessels that operate on the inland waterways eventually reach coastal harbors where oceangoing vessels operate. Vessels should be able to use a seamless AIS system covering all navigable waterways. Without access to nationwide VHF frequencies for that purpose, AIS would be a security tool only of very limited value.

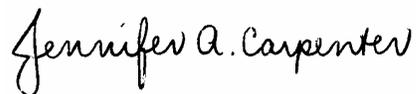
Second, AIS requires two VHF channels for proper operation. Channels other than 87B and 88B may be designated for this purpose, but in order for mariners to use alternate channels, base stations must be operated to command AIS units in those areas to switch from the default channels. Although manual channel setting might be considered an option, it introduces an opportunity for error, and is not available on Class B AIS units.

Third, non-AIS transmissions in inland areas could interfere with coastal and ocean AIS operation in certain situations. Although nominal VHF radio range is 20-50 miles, VHF channels are subject to atmospheric ducting, which sometimes allows VHF transmissions to be received hundreds of miles away. If channel 87B continues to be used for purposes other than AIS in inland VPSCAs, transmissions on that channel have the potential to interfere with distant AIS operations and therefore degrade the effectiveness of the AIS system for security and navigational safety purposes.

Finally, the Coast Guard plans to monitor AIS from satellites. Because of the large geographic coverage of satellite reception, such a system needs a truly nationwide channeling arrangement. The potential for satellite monitoring of AIS has been demonstrated, and is feasible. For this reason, channels 87B and 88B should be reserved for AIS purposes throughout the United States.

Thank you for the opportunity to comment. AWO would be pleased to provide further information on the inland and coastal tugboat, towboat, and barge industry operations or the use of AIS in our industry.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer A. Carpenter".

Jennifer A. Carpenter