

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Amendment of the Commission’s Rules	)	WT Docket No. 04-344
Regarding Maritime Automatic Identification	)	DA 07-2597
Systems	)	
	)	

To: Wireless Telecommunications Bureau

**REPLY COMMENTS  
OF THE  
UNITED STATES COAST GUARD**

The United States Coast Guard (“Coast Guard”) hereby respectfully submits these Reply Comments to the Commission’s June 14, 2007 Public Notice, (“Wireless Telecommunications Bureau Seeks Comment on Requests for Waiver to Permit the Approval of Class B Automatic Identification System (AIS) Devices”) and the Comments filed in response thereto.

In our December 1, 2006 Comments responding to the Commission’s Further Notice of Proposed Rule Making in this proceeding, the National Telecommunications and Information Administration (“NTIA”) and the Coast Guard urged the Commission to provide for the certification of Class B AIS devices on an expedited basis in order to meet the Commission’s goal of attempting to assure AIS is deployed “widely, quickly, cost-effectively, and in a manner that will maximize its capabilities.”<sup>1</sup> The Coast Guard therefore applauds the Commission for issuing the subject Public Notice and urges the

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<sup>1</sup> NTIA Comments, pp. 12-13, *citing* Amendment of the Commission’s Rules Regarding Maritime Automatic Identification Systems, *Report and Order and Further Notice of Proposed Rulemaking and Fourth Memorandum Opinion and Order*, WT Docket No. 04-344, RM-10821, FCC 06-108 (released July 24, 2006), ¶¶ 23, 26.

Commission to waive applicable provisions of Part 80 of its rules in order to provide for the certification of Class B AIS devices on an expedited basis pending final rules to be adopted in this proceeding.

The Comments filed in response to the Commission's Public Notice support the expedited certification of Class B AIS devices in order to promote safety and security of the maritime public, and to allow all mariners who wish to avail themselves of AIS technology the opportunity to do so. There were no Comments opposing the expedited certification of Class B AIS devices. The Comments also agreed, without exception, that Class B AIS devices must comply with the IEC standard, IEC 62287-1, and that Class B devices must be certified by the Coast Guard prior to receiving FCC certification.

In addition, the Comments filed noted that it is critical to the operation of AIS that accurate static information is transmitted by the Class B device. The NTIA and the Coast Guard stated in our December 1, 2006 Comments filed in this proceeding that the Commission should provide, as a requirement of certification, that user manuals, as well as conspicuous labels on the device, provide: (i) clear and concise information on how to enter and confirm static data; (ii) notification that once data is entered that it may not be changed by the user; and, (iii) a warning that: (a) it is a violation of the Commission's rules to input an MMSI that has not been properly assigned; and, (b) it is a violation of Coast Guard regulations<sup>2</sup> to enter any improper static information.<sup>3</sup>

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<sup>2</sup> See 33 C.F.R. § 164.46(b).

<sup>3</sup> Note, no static field should be left blank. The Coast Guard will accept a properly assigned vessel registration number in lieu of vessel name (see ITU-R M1371-3 Message 19 and 24 Part A) for those vessels that do not have an official name, e.g. USA VA123AA.

In addition to the foregoing, the Coast Guard believes, in accordance with both (i) the Reply Comments filed on November 13, 2006 by Shine Micro in this rule making proceeding, and (ii) the Coast Guard's *ex parte* filing of March 27, 2007 responding to that filing, that in order to be certified, Class B AIS devices must have a unique Message 24 Part B 42-bit Vendor ID field included that contains the manufacturers' identity, unit model, and unit serial number. The International Association of Marine Aids to Navigation and Lighthouse Authorities ("IALA") e-Navigation Committee met 19-23 March 2007 to consider this proposal. IALA agreed to this recommendation, adopting the document "Proposed Clarification on Vender ID field in Message 24B." This output will be included in the IALA Clarifications on ITU-R Recommendation M.1371-3. This clarifications document will be officially available after the ITU publication of ITU-R M.1371-3 is released, expected late this summer. IALA's Technical Clarifications become incorporated by reference into the ITU-R Recommendation M.1371 (series) specifying AIS equipment, under its *Recommends 4*.<sup>4</sup>

Shine Micro's November 13, 2006 Comments also proposed that Digital Selective Calling ("DSC") capability not be required in order to lower the cost of the AIS Class B unit. In its March 27, 2007 *ex parte* reply, the Coast Guard stated it understood the desire to keep costs down, but indicated that the value served by DSC's channel management capability and the need to maintain the integrity of the AIS VHF data link ("VDL") far

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<sup>4</sup> The manufacturer's identity consists of a three-character (18 bit) ASCII symbol as described in ITU-R Recommendation M.1371 (series), based upon NMEA 0183 (version 3.01) Appendix III, available from the National Marine Electronics Association, Seven Riggs Avenue, Severna Park, MD 21146, <http://www.nmea.org>. Mr. Steve Spitzer, NMEA Technical Director, has informed us that it will assign a three-character NMEA 0183 mnemonic vendor code at no charge. He has concurred with the IALA document.

outweighed the costs involved. Therefore, it is the Coast Guard's position that the DSC capability requirement must not be waived.

Finally, the Comments of Negron Marine Consultants ("Negron") requested that Class B AIS devices have the "ability to interface with PC's, and chart plotters, and radar displays, through NMEA/RS422 and RS237 inputs." The Coast Guard does not believe that such interface capability should be required at this time because it exceeds the requirements of IEC 62287-1; however, it must be noted that the full benefits of AIS may be better realized when an AIS device is integrated into on board navigation systems and displayed graphically as proposed by Negron. Congress has noted this<sup>5</sup> and forthcoming Coast Guard regulations<sup>6</sup> will expand the use of AIS, including Class B AIS, and will address the display of AIS information on an electronic chart system. Accordingly, as is the Commission's usual procedure, it should be noted on any waiver request that final rules adopted in the proceeding for certification of Class B AIS devices may contain requirements different from those acceptable to meet the waiver request.

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<sup>5</sup> Section 410 of House Report 108-617, accompanying the Coast Guard and Maritime Transportation Act of 2004, Public Law 108-293, states: "If the vessel is also required to have an Automatic identification system (AIS) on board the vessel under section 70114 of title 46, United States Code, the Conferees believe that the Secretary should require the AIS system information to be integrated with the electronic chart display."

<sup>6</sup> Unified Agenda, April 27, 2007, Items No. 1127 Navigation Equipment; SOLAS Chapter V Amendments and Electronic Chart Systems (72 FR 22619) and No. 1131, Vessel Requirements for Notice of Arrival and Departure and Automatic Identification System (72 FR 22620).

Based on the foregoing, the United States Coast Guard respectfully requests the Commission to waive applicable provisions of Part 80 of the rules to authorize expeditiously the certification of Class B AIS devices, in accordance with the views expressed herein, pending the adoption of final rules in this rulemaking proceeding.

Respectfully submitted,

UNITED STATES COAST GUARD



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By Direction of the Commandant

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