

GMDSS Task Force
1600 North Oak Street; #427
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19 March 2008

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

In the Matter of

Petition to Reconsider Amendment of)	WT Docket No. 00-48
Parts 13 and 80 of the Commission's)	Report No. 2854
Rules Regarding Maritime		
Communications		

**COMMENTS OF THE TASK FORCE FOR THE IMPLEMENTATION OF
THE
GLOBAL MARITIME DISTRESS AND SAFETY SYSTEM (GMDSS)**

The GMDSS Implementation Task Force respectfully submits these Comments in response to Public Notice No. 2854 of 5 March 2008 inviting comment regarding the Petition to Reconsider Amendment of Parts 13 and 80 of the Commission's Rules.

The GMDSS Task Force was chartered by the U.S. Coast Guard to supplement government functions through outreach to the private sector and recommendation to regulatory authorities. The Task Force membership is broad based including over 1600 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force

maintains a website at www.navcen.uscg.gov/marcomms which contains numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to pending regulatory proceedings.

The Task Force wishes to go on record as fully supporting the Petition for Reconsideration submitted by Owen and Kurt Anderson on 25 February 2008. The changes recommended constitute a thorough effort to improve the Rules concerning log keeping, equipment testing, and other measures to eliminate confusion and improve the consistency of the Rules.

The GMDSS Task Force has been especially active in recommending solutions to training issues involving the GMDSS. The Task Force originated the 40 hour GMDSS resident training criteria approved by the Coast Guard and advocated the Restricted GMDSS License for VHF-DSC operators. Task Force recommendations led to adoption of new Question Pools for GMDSS Operator and Restricted GMDSS Operator approved by both the Coast Guard and the FCC. Most of this work was developed by the GMDSS Training Task Group which includes the GMDSS Instructors from most of the schools teaching GMDSS courses. Both Owen and Kurt Anderson are long standing members of the Task Force and Owen Anderson chairs the Training Task

Group. The recent updating of the GMDSS Question Pools was done by the Training Group under Owen Anderson's leadership.

The Task Force has come to rely on recommendations from the Training Group and is pleased to have highly qualified volunteers who will undertake the detailed analysis necessary to produce the comprehensive recommendations in the Petition for Reconsideration. The Task Force enthusiastically endorses the changes outlined in the Petition for Reconsideration.

For the GMDSS Task Force

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