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22 August 2008

The Honorable Kevin J. Martin, Chairman  
The Honorable Michael J. Copps, Commissioner  
The Honorable Jonathan S. Adelstein, Commissioner  
The Honorable Deborah Taylor Tate, Commissioner  
The Honorable Robert M. McDowell, Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington DC 20554

Re: Certification of Class B Automatic Identification System (AIS) Devices;  
WT Docket No. 04-344

Dear Mr. Chairman and Commissioners:

The Coast Guard sponsored Task Force to assist in implementation of the Global Maritime Distress and Safety System (GMDSS) respectfully requests your assistance to expeditiously adopt interim or final rules urgently needed for certification of Class B AIS devices. This significant matter affecting the safety of navigation and security of our nation's waterways is under consideration in the WT Docket No. 04-344 and has been "on circulation" for nearly nine months. The GMDSS Task Force has a broad membership of over 2000 representatives from all sectors of the maritime community. The Task Force has made numerous recommendations to the Coast Guard and the Federal Communications Commission including filings in regulatory proceedings to enhance the effectiveness of the GMDSS and related electronic systems which enhance safety of navigation and national security.

At our recent Task Force meeting on 5 August 2008, members expressed bewilderment and frustration over the continued failure of the Commission to certify Automatic Identification System (AIS) Class B units. AIS Class A units are now required on all ships greater than 500 gross tonnage or of 300 gross tonnage for those on international voyage, and, are carried voluntarily by many smaller vessels. The lower cost Class B units conform to agreed international specifications and are intended to meet the needs of vessels which fit AIS on a voluntary basis<sup>1</sup>. AIS transmissions are paramount to the Coast Guard in carrying out its Maritime Domain Awareness (MDA) program to enhance national security. Additionally, these transmissions are utilized by Vessel Traffic Services (VTS) and all AIS equipped vessels for route planning and collision avoidance.

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<sup>1</sup> International Maritime Organization Resolution MSC.140(76), RECOMMENDATION FOR THE PROTECTION OF THE AIS VHF DATA LINK.

Our sources in the recreational boating community report that many of their vessels are now using Class A units routinely and finding the information a real benefit to safely while traversing port approaches and other areas of heavy traffic. The Coast Guard approved the Class B units over 20 months ago and it is estimated that many thousands of other boaters will fit these lower cost Class B units voluntarily once the Commission also grants approval.

Our manufacturing members are frustrated by the Commission's extended delay in permitting the sale of Class B units in the U.S. while their international competitors have been selling such equipment overseas for months. There is no known problem delaying approval by the commission. We understand that all necessary staff approvals were completed long ago and that the Docket has been "on circulation" with the Commissioners for final approval for several months. Letters and emails to the Commissioners on the subject from the Task Force and several of our members have gone unanswered.

The Task Force is aware that the Coast Guard has had new rule making under development for some time which would require thousands of smaller commercial vessels to carry AIS and that it is intended to authorize use of Class B for some of these vessels. Since the benefits of extending AIS carriage are obvious, there should be no linkage in delaying the take up of Class B by voluntary vessels while waiting for the Coast Guard to complete its rule making to extend mandatory carriage to new classes of commercial vessels.

The prevailing view of Task Force members, is that the Commission may be delaying action due to preoccupation with other issues not having been fully briefed on the significant benefits to safety of navigation by having more AIS equipped vessels participate. Prompt action to make the Class B units available will also greatly facilitate the Coast Guard's MDA program to enhance homeland security. For these reasons, the Task Force is seeking speedy Class B AIS approval action by the Commission.

Mr. Chairman and Commissioners, please expedite action to grant approval of the Class B AIS units in the interests of improved safety of navigation and better homeland security.

Sincerely,

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