

My name is David J. Ring, Jr., in 1980, I was US Coast Guard Radio Officer on supertanker "WILLIAMSBURGH" (call sign: WGOA) and I personally answered the SOS from passenger ship "Prinsendam" that was burning out of control in the Eastern Gulf of Alaska with about 535 people on board. During that rescue, Chief Radio Officer, Jack J.A. van der Zee sent out an SOS on 500 kHz wireless telegraphy (WT) emission A2A. This signal was heard all night and day at the location of the present day Maritime Radio Historical Society. Other forms of communication were tried by R/O van der Zee including satellite communication, 2182 kHz RT (radiotelephone) with two tone alerting alarm, but none yielded any additional help. However the technology employed on 500 kHz provided coverage from San Francisco, to Seattle, WA, to Juneau, Alaska, to Kodiak Island, Alaska, and even to New Zealand. Communications from Valdez, Alaska - the terminus port of the Trans-Alaskan Pipeline and our destination with the survivors, with this mode of communication reached San Francisco reliably throughout the day and night during the rescue. I know of no other communication mode and propagation frequency that has that ability to cover the area with reliable communication without blank spots.

According to Mr. Walter Weaver of the Commission's Aviation and Marine Bureau over 350 radio logs were received concerning this maritime casualty.

I believe it is important for our Nation's self interest to keep such communications facilities and to educate communications professionals in this technology

The cost to the USA would be minimal as these the various stations located in Massachusetts, Florida, Mobile, Alabama, California, and Seattle, Washington, are private enterprises which are either self-funded by charitable donations or commercial corporations which are funded by communication services that they provide to ships in USA territorial waters and outlying International waters. One such station that has such facilities, provided communication services during Hurricane Katrina when the USCG lost all of their communication facilities to communicate to their air and sea resources.

I agree with the comments of the Maritime Radio Historical Society (MHRS) regarding WRC-12.. Specifically, I agree with the MRHS position that the FCC should NOT support those portions of the recommendations for WRC-12 that would adversely effect MRHS station KSM and other stations such as WSC, WLO, WNE, KPH, and KLB in the maritime service.

Opposition of our delegation to WRC-12 to those agenda and other items which would eliminate the use of the 500 kHz band for Marine and Fixed Radio Communication services by Wireless Telegraphy. Our delegation will find support in this from other Administrations also wishing to allow this type of use, specifically in the areas of the Black Sea, and in the Far East where vessels and shore stations communicate on these frequencies and by these means.

Specifically the use of A1A and A2A on both the medium frequency (MF) and high frequency (HF) marine bands where currently permitted in the Commission's licenses should remain in force. Additionally the Commission should agree to any other compatible use as I understand that other Administrations are seeking to obtain Wireless Telegraphy stations for emergency point-to--point stations and fixed to mobile stations in the event of solar or electro-magnetic pulse (EMP) radio and satellite communication outages during which times the 500 kHz Wireless Telegraphy has been shown to be effective while all other communication systems showed at least temporary but severe outages.

Sincerely yours,

David J. Ring, Jr.
FCC Licensee