



Radio Technical Commission for Maritime Services

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Before the Federal Communications Commission

Washington, D. C.

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

In the Matter of)	
)	WT Docket No. 13-99
Marine Rescue Technologies Automatic)	
Identification System Maritime Survivor)	DA 13-796
Locating Device)	
)	
Request for Limited Waiver to Allow)	31 May 2013
Certification and Use)	

COMMENTS OF THE RADIO TECHNICAL COMMISSION FOR MARITIME SERVICES (RTCM)

The Radio Technical Commission for Maritime Services (RTCM)¹ respectfully submits these Comments in response to the Marine Rescue Technologies Limited (MRT) request for waiver to allow the equipment certification and use of its Sea Marshall AU9 Maritime Survivor Locating Device (MSLD).

¹ The RTCM is a non-profit organization whose objectives include studying and preparing reports on maritime electronic navigation and telecommunications practices. Our focus is on needs and technologies with a view toward improving efficiency and capabilities of maritime electronic navigation and telecommunications services, suggesting ways to keep rules and regulations to the minimum essential for effectiveness, and making recommendations on important issues. Established by the U.S. government in 1947 to support technical decision-making in the area of maritime radiocommunications, RTCM is now a membership organization that supports and encourages needed improvements in maritime communications and electronic navigation.

RTCM supports the request for limited waiver, provided that the device meets standard RTCM 11901.1 - In the public notice for this item, the Commission noted that a waiver was granted for the AU9 device to transmit on the frequency 121.5 MHz, based at least in part on the fact that it met the applicable parts of the RTCM Maritime Survivor Locating Device (MSLD) standard. Now the instant request seeks a waiver to allow the device to transmit identity and location information on the international AIS channels. RTCM has completed a revision of its MSLD standard (RTCM 11901.1) that includes requirements for MSLDs transmitting on AIS frequencies.² This standard was developed with the participation of MSLD manufacturers and representatives of the U.S. Coast Guard. We believe that it reflects the best practices for such devices operating on AIS frequencies.

On June 14, 2012, RTCM submitted a petition to the Commission, recommending, *inter alia*, that MSLDs operating on AIS frequencies be required to meet RTCM 11901.1. We understand that petition is currently under consideration. Approval of the waiver on the basis of compliance with RTCM 11901.1 would be consistent with our petition.

Sincerely,

A handwritten signature in black ink, appearing to read "R L Markle". The signature is written in a cursive, slightly slanted style.

R. L. Markle
President

² RTCM Standard 11901.1 for Maritime Survivor Locating Devices (MSLD), June 4, 2012.