

Captain Jack Fuechsel, USCG (Ret.)  
Director GMDSS Task Force  
1600 North Oak Street, #427  
Arlington VA 22209

15 August 2008

Admiral Thad Allen  
Commandant, U.S. Coast Guard  
2100 Second Street S.W.  
Washington DC 20593

Dear Admiral Allen,

I am the Director of the Coast Guard sponsored Task Force to assist in implementation of the Global Maritime Distress and Safety System (GMDSS). The Task Force has a broad membership of over 1800 representatives from all sectors of the maritime community. The Task Force has made numerous recommendations to the Coast Guard and the Federal Communications Commission (FCC) including filings in regulatory proceedings to enhance the effectiveness of the GMDSS and related electronic systems which enhance safety of navigation.

At our recent Task Force meeting on 5 August 2008, members expressed bewilderment and frustration over the failure of the FCC 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. Class B units 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. Additionally, these transmissions are utilized by VTS's and all AIS equipped vessels for route planning and collision avoidance.

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 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 FCC also grants approval.

Our manufacturing members are frustrated by the FCC'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 the FCC approval. We understand that all necessary staff approvals were completed long ago and that the issue has been on the desks of the FCC Commissioners for final approval for several months. Letters and emails to the Commissioners and Chairman Martin on the subject from the Task Force and several members have gone unanswered.

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

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 to complete rule making to extend mandatory carriage to new classes of commercial vessels.

The prevailing view of Task Force members, is that the FCC is delaying action due to preoccupation with other issues in the absence of official input from the Coast Guard requesting early action so as to make the Class B units available promptly for MDA and enhanced safety of navigation. The Task Force is seeking high level Coast Guard intervention with the FCC to request speedy Class B approval action citing the safety and MDA benefits of AIS.

In conclusion, we regret that the maritime community appears to be neglected by the FCC but we note that there is a better record of the FCC taking timely action on maritime issues when the Coast Guard makes its views known. The Task Force will greatly appreciate appropriate action by the Coast Guard to make it clear to FCC Chairman Martin that the Coast Guard is very anxious to have the FCC complete approval action on the Class B issue.

We request you write the FCC's Chairman Martin asking him to take prompt action in the Class B AIS matter.

Sincerely,

JACK FUECHSEL  
Director, GMDSS Task Force  
[gmdss@comcast.net](mailto:gmdss@comcast.net)  
703-527-0484

Copies to: RDML David Glenn CG-6  
RADM Brian Salerno CG-5  
Mr. Jeff Lantz CG-52