***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

45 L Street NE

Washington, DC 20554

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| In the Matter of﻿Wireless Telecommunications Bureau Refreshes Record on Performance Standards for Maritime Radiocommunications Equipment Listed in Part 80 of the Commission’s Rules | **)****)****)****)****)****)****)** | RM-11765 |

**COMMENTS OF the
radio technical commission for maritime services (RTCM)**

**Introduction**

The Radio Technical Commission for Maritime Services (RTCM) is a membership non-profit 501(c)(3) organization whose purpose and history are described in the original petition for rulemaking in the proceeding. RTCM membership is comprised of the maritime stakeholders from the US and foreign governments, marine equipment manufacturers, maritime communications service providers, marine dealers and distributors, US government contractors, technical standards organizations, technical service organizations, marine pilots organizations, marine transportation services, marine insurance providers and many other interested parties in the marine industry in the US and abroad.

RTCM works intimately with and is a Category A liaison[[1]](#footnote-1) member of the International Electrotechnical Commission (IEC) Technical Committee 80 – on Maritime navigation and radiocommunication equipment and systems. RTCM is also a member of the US National Committee (USNC) Technical Advisory Group (TAG) for IEC TC80[[2]](#footnote-2). The scope of TC80 is to prepare certification standards for maritime navigation and radiocommunication equipment and systems used on ships, and where appropriate on shore, for safety of navigation as well as distress and safety communications purposes. Certain of these IEC TC80 standards were set in motion by RTCM then further developed by IEC.

**Responding to the eight questions asked for each standard listed in the Public Notice**

Sixty-seven standards are listed in the Public Notice. Of these, forty-six have been superseded by later versions. Annexes A through D list each of these standards and respond to the eight questions asked in the Public Notice.

**International Maritime Organization standards incorporated by reference**

In its 2016 petition, RTCM proposed deleting several International Maritime Organization (IMO) performance standards as ﻿no longer needed, as they have been incorporated in other standards. While it is true most relevant IMO performance standards have been incorporated into IEC certification test standards, continued maintenance of most IMO standards was found to be necessary for other purposes, including installation, interpretation of Safety of Life at Sea (SOLAS) Convention regulations, and phase-in dates when newer standards become mandatory and older ones no longer apply.

Since the GMDSS was established during the 1990s, IMO has on several occasions mandated that Global Maritime Distress & Safety System (GMDSS) equipment installed on ships meet updated standards when installed on or after dates documented in those standards. Neither Subpart W nor the FCC ship inspection checklists include those dates nor the applicable standards. Ships not meeting these requirements could be held up by foreign port state inspections despite having passed its last FCC inspection.

Annex A includes a review of IMO standards incorporated by reference. That review includes information regarding relevant phase-in dates when newer standards become mandatory and older ones no longer apply.

**New standards needing to be incorporated by reference in Part 80**

Annex E lists eleven standards needing to be incorporated by reference in Part 80. Three of these new standards, AIS aids to navigation station, Class B/SO shipborne AIS, and DSC-equipped VHF handheld, are for equipment urgently needing expedited approval.

The newest NMEA and IEC maritime data interface standards are included as well, supplementing the old serial interface IEC 61162-1 currently included in Part 80.

IMO COMSAR.1/Circ.32/Rev.2 dated 3 July 2023, is intended to provide an unambiguous interpretation of the radio installation requirements in SOLAS chapter IV and related IMO resolutions, including and interpretation of IMO’s duplication of equipment requirement.

**Part 95 Subpart K standards incorporated by reference**

406 MHz maritime personal locating beacons (PLBs) and maritime survivor locating devices (MSLDs), are regulated under Part 95 Subpart K of the Commission’s rules. Certification test standards for these devices, which are used to locate and rescue persons in distress, also need updating. They are listed in Annex D.

**Proposal for routinely updating of standards incorporated by reference in Part 80**

RTCM recognizes the difficulties in continually updating standards incorporated by reference, and consequentially proposed in its petition that §80.7 *Incorporation by reference* be rewritten by listing specific, dated references to standards only here, ﻿to allow updating of all standards referenced in Part 80 to be accomplished in this section only. We believe this was the Commission’s intent for §80.7, but several standards, ITU-R, and IMO in particular, have specific standards listed throughout Part 80. This is easily correctable with ITU-R standards by simply deleting the dash number, but it is more difficult with IMO standards, whose identifier normally completely changes after each update.

Personal Locator Beacons and Maritime Survivor Locating Devices regulated in Part 95 Subpart K similarly require periodic update, but since there are only two standards listed, an incorporation by reference section should not be needed there.

RTCM proposes that FCC simplify references to maritime standards incorporated by reference in such a way that they can be effectively and routinely maintained.

This completes RTCM’s comments under this Public Notice refreshing the record on performance standards under this proceeding.

Sincerely,

Ed Wendlandt date
President RTCM

ANNEXES

Annex A – IMO standards incorporated by reference

Annex B – ITU standards incorporated by reference

Annex C – IEC/ISO standards incorporated by reference

Annex D – RTCM standards incorporated by reference

Annex E – New standards needing to be incorporated by reference

Annex F – Part 95 Subpart K standards incorporated by reference

1. The IEC defines Category A liaisons as “Organizations that make an effective contribution to the work of the technical committee or subcommittee for questions dealt with by this technical committee or subcommittee. Such organizations are given access to all relevant documentation and are invited to meetings. They may nominate experts to participate in a WG”. ISO/IEC Directives, Part 1, Edition 2024, §1.17.2. [↑](#footnote-ref-1)
2. The U.S. National Committee of the International Electrotechnical Commission (USNC/IEC) serves as the focal point for U.S. parties who are interested in the development, promulgation and use of globally-relevant, voluntary consensus standards. The USNC is the United States’ representative to the IEC and is sponsored by the American National Standards Institute. [↑](#footnote-ref-2)