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JOINT IMO/ITU EXPERTS GROUP ON
MARITIME RADIOCOMMUNICATION
MATTERS
12th session
Agenda item 4

IMO/ITU EG 12/4/2
29 June 2016
ENGLISH ONLY

REVIEW AND MODERNIZATION OF THE GLOBAL MARITIME DISTRESS AND SAFETY SYSTEM (GMDSS)

Remarks on the review of the GMDSS taking into account the outcome of NCSR 3

Presented by France, Portugal and Romania

SUMMARY

***Executive
summary:***

This document takes into account the outcome of NCSR 3 relative to GMDSS review in order that GMDSS remains a straightforward concept. It also aims to reduce amendments of the various instruments related to GMDSS. Presents functional requirements and order of priority are already well known by users, substantial modifications of these fundamentals would create confusion

Action to be taken: Paragraph 13

***Related
documents:***

NCSR 1/28, MSC 94/21, NCSR 3/14, NCSR 3/17, NCSR 3/21
NCSR 3/29, IMO/ITU EG 12/2, IMO/ITU EG 12/4

Introduction

1 The outcome of the third session of the Sub-Committee on Navigation, Communications and Search and Rescue (NCSR 3) on the modernization of the GMDSS as indicated in the document NCSR 3/29 specifies the following views were expressed amongst others:

- .1 the design of the GMDSS, as developed in the general review, needs to be simplified so that it remains straightforward, logical and clear to users;
- .2 in drafting related amendments to SOLAS, references should be made to the texts and terminology already developed by IMO or ITU; and
- .3 further considerations should be given to the need to define "Security-related communications" and "other communications".

2 Although NCSR 3 agreed that the work done by the Correspondence group on the review of the GMDSS and the IMO/ITU EG, in relation to the development of the draft version of SOLAS Chapter IV, as set out in document NCSR 3/17, annex, appendix 3, was very valuable, this document is still a draft and need to be considered in the light of the outcome of NCSR 3. The amendments to the SOLAS Convention and related instruments should be addressed after completion of the modernization Plan of the GMDSS and aim for an entry-into-force date of 2024. It is then necessary to consider these amendments in the light of the Human Element or simply the understanding of these amendments by users.

3 Furthermore, in accordance with the MSC-MEPC.1/Circ.4/Rev.4, in drafting amendments to the SOLAS Convention, cross references should be made to texts and terminology previously developed by IMO and ITU. This will avoid unnecessary duplication and reduce the need for excessively detailed provisions and for subsequent harmonization.

Fundamental principles

4 GMDSS was developed to facilitate distress, urgency, safety and other communications at sea. The nine current functional requirements are sufficient to cover all radiocommunication needs and to ensure the consistency of the GMDSS. Widely known and used by seafarers, the stability of these principles is important for ensuring the effectiveness of the modernization of the system.

Need to maintain a coherent system for users

5 The preliminary draft of revised SOLAS Chapter IV presented in document NCSR 3/17, annex, appendix 3, separates from the GMDSS the "security-related communications" and "other communications". However, the central concept of the GMDSS is to use the same radio equipment, whatever the need. The proposal to separate certain communications creates a break in the unity of the GMDSS and a gap in SOLAS affecting consistency in radiocommunications. The unity and straightforward objectives must remain central to the work of the Organization. Indeed, communication systems are used by seafarers involved in many tasks and operating in a changing technological environment. It is therefore vital to facilitate and harmonize the operation of communication systems so that they are understood and used by seafarers at best.

Transmitting and receiving safety related information

6 The functional requirement provided in document NCSR 3/17, annex, appendix 3, of transmitting and receiving safety-related information can be deleted because this functional requirement is already an obligation under SOLAS Chapter V for vessels and is covered by other existing GMDSS functional requirements, such as "general communications" as defined during the general review.

Transmitting and receiving security-related communications

7 Furthermore, the document NCSR 3/17, annex, appendix 3, creates an extra functional requirement with the need to communicate between the Coast States and the vessels some security-related information. For example, in practice, Coast States disseminate information on the security level of port facilities and vessels inform ports of their security level and specify their previous ports of call.

8 However, the requirement to broadcast information relating to the port facility security is already included in paragraph 4.2.2.17 of IMO/IHO/WMO joint manual on Maritime Safety Information, as defined in MSC.1/Circ.1310. As for the security-related information of ships, they are already managed by existing functionality of the GMDSS, such as "general communications" as defined during the general review and even present "general radiocommunications" of the actual system. There is no added value for the modernization of GMDSS to create security-related communications.

Public correspondence

9 It is always pertinent to mention in the GMDSS "public correspondence" as defined in the Radio Regulations (RR) and its availability for the vessel when required for safety purposes¹. Finally, the detailed review has stressed that many radiocommunication systems rely on the PSTN². Many communications between centres ashore and ships pass regardless of the priority level through the PSTN which is a particularly important case of "public correspondence" for the proper functioning of the GMDSS.

10 It should be also consider the ship-to-ship communications within the GMDSS for operational communications and public correspondence traffic, other than distress conducted by radio.

Other communications and general radiocommunications

11 The definition provided in NCSR 3/17, annex, appendix 3, for "other communications" creates confusion. Indeed, the RR defines "other communications" as the fourth priority level. We must keep the RR definition because it is well known to seafarers. Thus it is proposed to use the definition of "Other communications" as defined by the general review and reintroduce the term "general radiocommunications"³ by enlarging the scope to public correspondence as it is set out in annex.

12 The new proposed definition in annex of "general radiocommunications" is taking into account MSC/Circ.1038⁴, the discussion during the HLR and NCSR3. In particular the reliability and secure use of PSTN, together with guidance set out in resolution A.856(20)⁵, are necessary to "general radiocommunications". It is also proposed to fill a gap to include ship-to-ship communications as mentioned above in point 10.

Action requested of the Experts Group

13 The Experts Group is invited to consider the comments and observations above, and the amendments proposed to SOLAS Chapter IV in annex and to take action as appropriate.

¹ Report to RR article 33.53.

² PSTN: Public Switched Telephone Network.

³ By definition, these communications are made by radio. Confusion is particularly sensitive in the English version of the HLR (see NCSR 1/28, annex 10); the French version maintains the term "Radio".

⁴ MSC/Circ.1038 (*Guidelines for general radiocommunications*).

⁵ A.856(20) (*Guidance to administration on development of shore-based SAR telecommunication infrastructure*).

ANNEX

Proposed amendments to SOLAS Chapter IV

Regulation 2 *Terms and definitions*

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.5 *General radiocommunications* mean operational communications and public correspondence traffic, other than distress conducted by radio.

Regulation 4 *Functional requirements*⁶

Every ship, while at sea, shall be capable of:

- .1 transmitting ship-to-shore distress alerts by at least two separate and independent means, each using a different radiocommunication service;
- .2 receiving shore-to-ship distress alert relays;
- .3 transmitting and receiving ship-to-ship distress alerts;
- .4 transmitting and receiving search and rescue coordinating communications;
- .5 transmitting and receiving on-scene communications;
- .6 transmitting and receiving signals for locating;
- .7 receiving Maritime Safety Information (MSI);
- .8 transmitting and receiving general radiocommunications to and from shore-based radio systems or network as well as to and from other ships subject to the provisions relating to regulation 15.8; and
- .9 transmitting and receiving bridge-to-bridge communications.

...

Regulation 15 *Maintenance requirements*

...

15.8 While all reasonable steps shall be taken to maintain the equipment in efficient working order to ensure compliance with all the functional requirements specified in regulation 4, malfunction of the equipment for providing the public correspondence required by regulation 4.8 shall not be considered as making a ship unseaworthy or as a reason for delaying the ship in ports where repair facilities are not readily available, provided the ship is capable of performing all distress and safety functions.

⁶ It should be noted that ships performing GMDSS functions should use the Guidance for avoidance of false distress alerts adopted by the Organization by resolution A.814(19).