

## Radiocommunication Study Groups



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### **International Organization for Marine Aids to Navigation (IALA)**

#### **IALA RESPONSE TO ITU-R W5B ON DRAFT REVISION OF ITU-R M.1371-5**

#### **Technical characteristics for an automatic identification system using time division multiple access in the VHF maritime mobile frequency band**

## **1 Introduction**

IALA expresses its gratitude to ITU-R Working Party 5B (WP 5B) for sharing the progress on the continued work in the revision of the recommendation ITU-R M.1371-5. We note that parts of the updated recommendation incorporate considerations initially suggested by IALA.

## **2 Discussion**

To contribute to this revision, IALA previously submitted a liaison note to the ITU (ITU Document 5B/322-E, dated 3 May 2021) and to the IMO ITU EG 17 (IMO ITU EG 17-7-2). This liaison note reflects recently approved IALA documents that establish the organization's official position on matters concerning ITU-R M.1371-5 and the use of AIS AtoN. IALA offers the following comments for consideration, requesting that ITU-R W5B take note of these points and take appropriate action as necessary:

### **AIS message 21 Aid-to-navigation report:**

The proposed changes to table A7-29 are correct, and the edits are welcomed by IALA.

### **New single slot message #28:**

IALA agrees with the new single slot message #28 in general, but have following comments:

In reference to Table A7-42, type of aid to navigation, mobile AtoN, code 39: Mobile AtoN: Fishing Apparatus, this status code must be deleted.

A fishing apparatus is not in accordance with any of the IALA definitions of AtoN, not in any reference documents such as the IALA dictionary, and particularly not in the IALA MBS. If this code is retained, it will trigger a surge of unwanted future use of AIS ch1 and AIS ch2, with the likelihood to further overload the VDL. IALA supports the development of AMRD type B as a solution to the challenges of marking fishing apparatus now and in the future.

The conclusion on the use of AMRD type A or type B IALA presents is:

- the use of type A is strictly for AtoN, i.e. enhance the safety of navigation,
- the type B includes other use cases (such as fishing apparatus), i.e. do not enhance safety of navigation, and
- this is also according to ITU/IMO policy on AMRD use.

**Table A7-42, type of Aid to Navigation, Mobile AtoN, code 49-56**

The IALA Maritime Buoyage System (MBS) defines the system of various marks, floating, fixed, AIS AtoN and MAtoN. In table A7-42 code 49-56, there are new combinations of marks proposed. Such as, combining Mobile AtoN with an indication of north, east, south and west, as well as combining Mobile AtoN and Cardinal Marks. This is to our understanding intended for marking of areas. This use violates the principles in the MBS and must be avoided. This could lead to confusing the mariner as all marks in the MBS are defined both physically in colour, shape etc as well as how their signal characteristics (light or radio signal). Therefore, it is not possible to combine two types of marks.

**Table A7-41, message 28: Single-slot Aid-to-Navigation Report, AIS AtoN Station Type**

In *IALA Recommendation R1016 Mobile Marine Aid to Navigation (MAtoN)*, the definition of MAtoN is defined (figure 1):

<p><b>1 DEFINITION</b></p> <p>A MAtoN is defined as a non-fixed or un-moored Aid to Navigation (AtoN); it does not include a fixed or moored buoy that is adrift from station, temporarily or otherwise.</p> <p>A MAtoN can be fitted with an Automatic Identification System (AIS) device transmitting message 21.</p> <p><i>Note: MAtoN should not be used for unmanned vessel applications. The lights exhibited by these vessels should comply with COLREGS, or other Competent Authority regulations.</i></p>
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**Figure 1 MAtoN definition**

As mentioned in the draft Recommendation ITU-R M.1371-5, option type 5, Mobile AtoN, self-propelled, IALA would like to note that this seems very close to being a unmanned vessel operation and therefore required to comply with COLREGS etc. There is no mention of self-propelled AtoN in the IALA MBS and we are therefore unaware of the use cases for self-propelled AtoNs.

Also to note, in the IMO documentation there is a typo, it states IMO Circ. 1463, the correct IMO Circ. is 1473.

The ITU-R Working Party 5B (WP 5B) is requested to note the information provided and revert the edits in the draft revision of Recommendation ITU-R M.1371-5, according to this and previous inputs.

### 3 Action requested

ITU WP5B is requested take the aforementioned discussion into account and undertake appropriate actions as deemed necessary.