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| From: VTS Committee | VTS 37-14.1.2.3 |
| To: e-NAV Committee | 20 September 2013 |

Liaison Note

Comments on the Discussion paper on Testbeds and the Associated Terms of Reference for the new e-NAV Working Group

# Introduction

The e-NAV Committee requested the IALA VTS Committee to note the information provided (ref e-NAV13/output/11) and make any comments to the e-NAV Committee. This paper was considered, taking into account the Terms of Reference (eNav13/output/10) for the new e-NAV working group (eNAV WG7 Testbeds).

Considering the growing importance of testbeds to the development of e-navigation, the VTS Committee appreciates the intended efforts to collect, collate and share the available testbed information. However, a number of concerns arise which are summarized in this liaison note.

# Specific Concerns and Comments

1. Note that the discussion paper does not appear to be well aligned to the Terms of Reference (TOR)
2. From the Terms of Reference, the VTS Committee understands that the primary objective of the new working group is to collect and share information pertaining to testbed activities.
3. Given the request by IMO to develop guidelines for the collection and sharing of information relating to testbeds, it would be expected that developing such guidelines should be listed as a primary task in the TOR.
4. Any guidelines developed should not exceed the intended primary objective – see point 1 above. Specifically, is the development of standards part of the associated task in the TOR? If so, it needs to be clear that these standards relate to the desired format of the published results paper and the interaction with the IALA testbed website (only).
5. Overall, there seems to be an inadequate consideration of industry as a stakeholder in R&D activities (which could also be termed “testbeds”) (see various comments below)
6. The suggestion to impose external formal quality assurance procedures (for example those applicable to a product) raises some concerns in the context of testbed activities (it may restrict innovation and/or increase costs).
7. The publication of results should not be a mandatory requirement, especially when considering the case in which industry is funding or partially funding an R&D testbed activity and may reserve the right to publish any or all of the associated findings.
8. The scope of activity of the new working group is not very clear and needs clarification. For instance, at one extreme, the scope could be coordination of progress and results of those interested in participating, but could also be interpreted (at the opposite extreme) as all R&D activity (by authorities and by industrial members) is to be registered, approved, monitored QA approved, published etc. by the e-NAV working group.
9. Specific comments against the sections of the discussion document are listed below:
   1. In section 6, the contents of the bulleted list describe the typical activities of a generic testbed activity. However there is scope to interpret the list as a list of activities to be coordinated by the working group.
   2. In section 6.1.1, forcing a strong link to established user requirements may be too stringent and may constrain innovation and evolution of e-NAV technology and standards in the future.
   3. In section 6.1.2, the requirement to align with the IMO e-Navigation architecture and the MSP may not be applicable to some testbed activities.
   4. In section 6.1.4, the introduction of IMO guidance on system quality assurance should only be in the context of establishing a standard for the published test bed documents. If it is applied to the equipment under test it will constrain test flexibility, delay implementation and add costs.
   5. In section 6.1.7, this is the first mention of the existence of agreed standards. Who will generate (and agree) the agreed standards? Secondly, will tests that are useful to the e-Nav community, but not to the standard, be discarded? Thirdly, will industry be expected to be compliant to such standards, even when funding or partially funding an R&D testbed activity?
   6. In section 6.1.7, the responsibility for quality assurance is not clear (the IALA working group?). Also, commercial confidentiality should be considered and may limit the publication of some or all of the required contents of a set of results.
   7. Section 6.3 could imply that all testbeds will be required to use the Maritime Service Portfolio (MSP) – this will restrict the collation of potentially useful testbed information which, for good reason, has not used the MSPs.
   8. Section 6.3, 3rd bullet, reword as ‘single point of reference for *published* testbed information’
   9. Section 6.3, 4th bullet, reword as ‘*contributes* to the evolution of e-Navigation’
   10. Section 6.3, bullet 4 is duplicated in bullet 6
   11. Section 6.3, 7th bullet, this statement is acknowledged but may need to recognize commercial confidentiality (for industrial members of IALA)
   12. Section 6.4, second paragraph is not applicable under the heading of ‘reporting and results’.
   13. Section 6.4, second paragraph: will a standard ever be *agreed*? ‘Essential’ is too restrictive, ‘desirable’ might be more appropriate
   14. In section 8, IALA industrial members of the VTS Committee do not agree to the request to ‘forward **any** information on current and completed testbeds and **any** R&D projects…’

# Action requested

The e-NAV Committee is requested to:

1. Consider the responses given above,
2. Consider amendment of the Terms of Reference for the new e-NAV Working Group on Testbeds
3. Make reference to the above comments when continuing with their planned activities.