ANM18 Input paper

Agenda item 9.4

Task Number 9

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Spanish comment on Draft Revised Guideline 1004

# Comments

The following comments are offered for consideration in the development of the revised Guideline.

* Define the concept of LOS and OPS separately and clearly. The title of section 2.2 suggests that terms are equal or at least equivalent.
* In the document there are several examples that could contradict each other. For example, the 2nd - 3rd paragraphs of 2.2.3 and 2..2.3.2 point.
* Expressions " ... at required range..."  be clarified and indicate the range required, the nominal range shown on nautical publications or "user range or expected range"  (myself) considering the meteorological visibility.
* It should be noted that OPS may differ from the values published in nautical documents.
* In section 2.3 is used several times the phrase "equipment availability"; the concept of availability correspond to the service (availability), while the equipment is applied the term "reliability". Don't use, if it's possible, the term availability out of the AtoN concept of availability-reliability (I suggest modify the beginning of point 4 of part 3.2.1)
* Make some reference to OPS for Non-SOLAS vessels
* In section 2.5 some reference to the IALA Risk Tool
* Appendix A-Example uses the term "aural" little used in the IALA documents to acoustic signals.
* For example, when defining the service standard says that the signal is visible, but would have to define what is "visible", how far.

# Discussion

I am very interested in the issue of Levels of Service and their connection with the availability and especially with the OPS. I think could be different from the nominal range data published in the charts and lists of lights. This range is not real and assume that the signal is visible always it's turned on. I think is a mistake, because in reality, the service would only cover a smaller area due to the meteorological visibility less (in most cases) [my "user or expected range"].

# Action requested of the Committee

The Committee is requested to consider the comments and discussion above when developing the revision of Guideline 1004.