Radio Technical Commission for Maritime Services
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December 30, 2024

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Statement, WT Docket No. 21-230

Dear Ms. Dortch:

On May 2nd 2022, the RTCM filed a statement to this docket advising that work had begun on developing an AIS mobile aids to navigation station standard operating on channels AIS 1 and AIS 2 which, among other purposes, would be capable of being used to mark fishing equipment that may cause a hazard to navigation to vessels operating in its vicinity. We are pleased to announce that work has been completed and the standard has been adopted and published. A copy of this new standard *RTCM 12110.0 Automatic Identification System (AIS) Mobile Aids to Navigation (MAtoN) Stations* is being provided to the Commission under separate cover, with copies also available from RTCM's Published Standards & Publications webpage[1], under Maritime Navigation Equipment Standards.

RTCM members and experts from industry and government, including domestic and international experts, were involved in its development, and took into account:

- relevant regulations and standards of the International Telecommunications Union Sector for Radiocommunications (ITU-R), International Maritime Organization (IMO), International Organization for Marine Aids to Navigation (IALA), and International Electrotechnical Commission (IEC);
- the technical committee's decision that the standard not unnecessarily predefine, constrain or encumber the licensing or approval process for MatoN stations;
- the multi-purpose requirements for a MatoN, which may be free-floating, or if self-propelled provides information on its direction and speed of movement;
- the desire or need for geofencing capability that would define or restrict its operating areas;
- the need to support individual and preprogrammed Maritime Mobile Service Identities (MMSIs) depending upon how it is licensed; and,
- benefits, battery life, and total cost.

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[1] See https://www.rtcm.org/publications

RTCM proposes that a further notice of proposed rulemaking be issued under this proceeding based upon this standard. The following issues should be considered and addressed in this rulemaking:

- Radio station licensing of these devices.[2]
- Assignment of Maritime Mobile Service Identities (MMSIs). Recognizing that severe constraints exist on the number of MMSIs that can be assigned[3], provisions have been made for allowing preprogrammed identities in situations where devices are not individually licensed. MMSI duplication in such cases may be unavoidable.
- Geofencing capability restricting the devices operation to approved areas. The standard provides for a geofencing capability only if required by the competent authority.
- U.S. Coast Guard review of test reports and data prior to submission of the certification application, as is currently required[4] for all AIS devices.
- Licensing and certification of fixed private AIS AtoN stations meeting the requirements of IEC 62320-2[5] should also be considered in this rulemaking.

Sincerely,

Ed Wendlandt
President RTCM

cc: FCC (Roger Noel, Chief Mobility Division)
        USCG (Jerry Ulcek CG-672; Jorge Arroyo CG-NAV)
        NTIA OSM (Charles Cooper)

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[2] Note that the U.S. Coast Guard is responsible for reviewing and approving the use of all maritime private aids to navigation, including AIS aids to navigation and AIS mobile aids to navigation, in accordance with 33 CFR 66. USCG AIS aids to navigation application procedures are described here.

[3] Only 2000 MMSI identities can be assigned per Maritime Identification Digit (MID). The United States only has five MIDs assigned by ITU-R, limiting the total number of assignable MMSIs to 10,000.

[4] See 47 CFR 80.231(b), 80.233(b) and 80.275(a).

[5] RTCM 12110.0-compliant AIS Mobile AtoNs are based upon and similar to the IEC 62320-2-compliant fixed AIS AtoNs. RTCM petitioned FCC in 2016 to incorporate IEC 62320-2 in Part 80, providing the most recent version of this standard in its October 22, 2024 comments filed under FCC proceeding RM-11765. FCC with RTCM support has approved waivers allowing certification and licensing of IEC 62320-2 private AIS AtoNs.