



Radio Technical Commission for Maritime Services

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**Before the Federal Communications Commission
Washington, D. C.**

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

In the Matter of)	
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Delete, Delete, Delete)	GN Docket No. 25-133
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**COMMENTS OF THE
RADIO TECHNICAL COMMISSION FOR MARITIME SERVICES (RTCM)**

Introduction

The Radio Technical Commission for Maritime Services (RTCM) is a non-profit organization whose objectives include improving marine navigation, maritime safety and search and rescue for all at sea through the appropriate use of maritime electronic navigation and radiocommunications systems and practices. Initially established in 1947 to support technical decision-making in the area of maritime radiocommunications, RTCM became a membership-based, non-profit 501(c)(3) organization in 1982¹. RTCM develops, encourages and supports needed improvements in maritime communications and electronic navigation through technical standards, studies, reports, and participation in other domestic and international technical standards and regulatory bodies.

¹ RTCM membership is comprised of the maritime stakeholders from the US and foreign governments, marine equipment manufacturers, maritime communications service providers, marine dealers and distributors, US government contractors, technical standards organizations, technical service organizations, marine pilots organizations, marine transportation services, marine insurance providers and many other interested parties in the marine industry in the US and abroad.

During its seventy-eight-year history, RTCM has often engaged in spectrum and radio regulatory-related matters on behalf of the maritime community, supporting their needs such as in collaborative technical studies and standards, preparing for and participating in International Telecommunications Union (ITU) World Radio Conferences, and participating in FCC rulemakings where maritime interests are affected.

RTCM limited its review to *Part 80 Stations in the Maritime Services* and *Part 95 Subpart K Personal Locator Beacons and Maritime Survivor Locating Devices* portions of this Direct Final Rule, and is submitting comments due to its vested interest in the proceeding and the potential impact on its ongoing work.

Comments

General comments

1. Most of the Part 80 deletions included a brief introductory text (scope) of a Subpart and cross-references to other regulations applicable to that Subpart. While arguably helpful to the understanding of these regulations, these deleted texts are not necessary, and therefore RTCM has no comment regarding these deletions.
2. RTCM is unaware of current radioprinter operations in the maritime service and therefore has no comment regarding its deletion.
3. RTCM has no comment regarding the two deletions in Part 95 Subpart K.

Retention necessary

4. This Direct Final Rule deletion of § 80.71 would remove certain operational requirements for Alaskan public and private stations. RTCM has no comment regarding deletion of the radiotelegraphy and medium frequency radiotelephony portions of this regulation, nor does it object to deletion of the radiotelephony channel switching provisions of section (d). However, means for quickly discontinuing all emissions from remote stations operating in the band 156-162 MHz as described in section (b) are still relevant and should be retained. Channels in this band are used for distress and safety purposes, and stuck carriers or unintentional emissions do still occur. RTCM requests those provisions not be deleted absent appropriate review and comment period open to affected parties.
5. This Direct Final Rule deletion of § 80.333 would apparently remove authority for distress transmission and provisions for transmission of distress messages by maritime

mobile satellite stations not itself in distress, including systems such as Inmarsat and Iridium capable of transmitting a distress message. Mobile stations and ship earth stations in the maritime mobile-satellite service are technically two very different types of stations. RTCM requests those provisions not be deleted, or alternatively, the “mobile” be simply deleted from § 80.311 and 80.324. That change could be accomplished editorially.

Provisions affecting ship radio inspectors and inspections

6. This Direct Final Rule deletion of § 80.175 would apparently remove the requirement that all ship operator licenses be available for inspection. While FCC staff have this right, FCC staff stopped performing ship radio inspections after inspections were privatized over twenty-five years ago. FCC’s own ship inspection checklists include this requirement². It is unclear which provisions would allow privatized inspectors continue this function were this rule to be deleted. RTCM requests those provisions not be deleted absent appropriate review and comment period open to affected parties.
7. This Direct Final Rule deletion of § 80.409 (f)(1)(i)(F) and (f)(2)(iv) would apparently remove requirements that vessel operators note problems with the inspection or inspector, or note repairs made as a result of an inspection. Removal of (f)(1)(i)(F) would remove certification by the owner, operator, or master of a vessel subject to part II or III of title III of the Communications Act and/or the Safety Convention that the inspection was satisfactory.³ This certification supports accountability and facilitates compliance verification. RTCM requests those provisions not be deleted absent appropriate review and comment period open to affected parties.

Further, more substantial simplifications, modernization and deletions are needed to Part 80

8. In February 2016, RTCM filed a petition for rulemaking proposing significant simplification, modernization and deletions for Part 80. In it, RTCM proposed several specific improvements including eliminating *Subpart R – Technical Equipment Requirements for Cargo Vessels Not Subject to Subpart W* (GMDSS), an obsolete category of vessel requiring radio systems no longer in operation; removing or replacing obsolete requirements in other Subparts for radio systems no longer in use; and updating and easing radio safety equipment certification processes manufacturers must follow

² See <https://www.fcc.gov/wireless/bureau-divisions/mobility-division/maritime-mobile/ship-radio-stations/ship-inspections>. For example, the small passenger vessel checklist page 5 Publications and Documents paragraph b) includes a check for operator’s licenses.

³ The FCC vessel checklist cited above also includes a place for the master’s signature.

before equipment can be sold or marketed in the U.S. In April of that year, the Commission sought public comments on this petition, which were supportive⁴. However, except for a refresh of the record regarding performance standards in September 2024, there has been little progress toward rulemaking to implement these needed improvements. RTCM urges the Commission reconsider that nearly ten-year-old petition by implementing these badly needed simplifications, modernization and deletions to Part 80.

This completes RTCM's comments for WT Docket No. 25-133.

Sincerely,

/s/ E. B. Wendlandt

Ed Wendlandt
President RTCM

cc: Jerry Ulcek (USCG)
Roger Noel, Thomas Derenge, Kathleen Curameng, Katie Knox (FCC WTB)

⁴ See FCC Proceedings RM-11765