GUIDELINES ON STANDARDIZED MODES OF OPERATION, S-MODE

Comments on document NCSR 6/7

Submitted by the International Chamber of Shipping (ICS)

SUMMARY

Executive summary: This document provides comments on inclusion of definitions of the terms "generic training" and "familiarization" in the draft Guidelines for the Standardization of User Interface Design for Navigation Equipment (NCSR 6/7).

Strategic direction, if applicable: 2

Output: 2.12

Action to be taken: Paragraph 10

Related document: NCSR 6/7

Introduction

1. This document is submitted in accordance with the provisions of paragraph 6.12.5 of the Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies (MSC-MEPC.1/Circ.5/Rev.1) and comments on document NCSR 6/7 (Australia) providing the Report of the Correspondence Group on the Draft Guidelines for the Standardization of User Interface Design for Navigation Equipment.

Discussion

2. The terms "generic training" and "familiarization" are defined in the draft Guidelines for the Standardization of User Interface Design for Navigation Equipment (NCSR 6/7, annex 1, paragraphs 8.4 and 8.5).
3 The terms "generic training" and "familiarization" are not defined in either:
   .1 the STCW Convention and Code; or
   .2 the ISM Code.

4 ICS considers that terms which are used but not defined in mandatory instruments
   should also be used but not defined in recommendatory instruments. This is particularly the
   case where a guidance uses terms in a context not strictly related to the mandatory instruments
   from which the terms originate. In this case, guidance on standardization of user interface
   design of equipment required by SOLAS chapter V, rather than guidance on the training and
   familiarization of seafarers required by the STCW Convention and Code, and the ISM Code.

5 The reference to IMO model courses in the definition of "generic training" is
   inappropriate, taking into account the clarifications of the status of model courses provided in
   Guidance for Parties, Administrations, port State control authorities, recognized organizations
   and other relevant parties on the requirements of the STCW Convention, 1978, as amended
   (STCW.7/Circ.24/Rev.1, paragraphs 3 and 4).

6 To date, the terminology "generic training" appears to be specific to ECDIS in
   IMO instruments. It is not considered to be a term used in the context of other navigation
   equipment to which the draft Guidelines are expected to apply. Moreover, the phrase
   "generic training" is not defined in other relevant recommendatory guidelines in which it
   appears, including ECDIS – Guidance for Good Practice (MSC.1/Circ.1503/Rev.1).*

7 Consequently, ICS is concerned by the intention to define "generic training" and
   "familiarization" in the draft Guidelines. It is questioned whether it is appropriate to include the
   definitions, particularly without consultation with the HTW Sub-Committee. Moreover, it is
   questioned whether the definitions are strictly necessary for the draft Guidelines to achieve
   their primary purpose: standardization of user interface design for navigation equipment.

Proposal

8 ICS recommends deletion of the definitions for "generic training" and "familiarization"
   from the draft Guidelines in document NCSR 6/7, annex 1, paragraphs 8.4 and 8.5 (Australia).

9 Alternatively, should the Sub-Committee consider that such definitions are essential
   for the implementation of standardized modes of operation for navigation equipment,
   ICS recommends that the text of the definitions is forwarded to the HTW Sub-Committee for
   review. The HTW Sub-Committee may be invited to provide confirmation, or otherwise, of the
   appropriateness of the definitions and any potential unintended consequences beyond the
   draft Guidelines.

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the proposal in paragraph 8 and, if
    necessary, the alternative provided in paragraph 9, and take action as appropriate.