SUB-COMMITTEE ON NAVIGATION, COMMUNICATIONS AND SEARCH AND RESCUE
5th session
Agenda item 11

REVISION OF SOLAS CHAPTERS III AND IV FOR MODERNIZATION OF THE GLOBAL MARITIME DISTRESS AND SAFETY SYSTEM (GMDSS), INCLUDING RELATED AND CONSEQUENTIAL AMENDMENTS TO OTHER EXISTING INSTRUMENTS

Comments on the Report of the Correspondence Group

Submitted by Antigua and Barbuda, France, Islamic Republic of Iran, Portugal, WMO, IHO and IMRF

SUMMARY

Executive summary: This document comments upon the submission to set SOLAS regulation IV/4 on GMDSS functional requirements by considering the simplification of the definition of "general communications" and the provisions of the Radio Regulations

Strategic direction: SD 2

High-level action:

Output: 2.10

Action to be taken: Paragraph 15

Related documents: NCSR 5/11 and NCSR 5/12

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) and provides comments on the Report of the Correspondence Group, as set out in document NCSR 5/11 (United States).
Discussion

2 "Operational radiocommunications" have never been discussed in the modernization of the GMDSS, and this is a remaining part of the present definition of "general radiocommunications":

"General radiocommunications means operational radiocommunications and public correspondence traffic, other than distress, urgency and safety messages, conducted by radio."

3 In the outcome of the high-level review, it was underlined necessary to remove "public correspondence" in the modernization of GMDSS. The intention was to use any other system to communicate messages that are not distress, urgency or safety messages for the new functional requirement "other communications" which would be dissociated from GMDSS.

4 The idea to remove public correspondence from the GMDSS was also to give the possibility to use alternative radiocommunication systems as to the one adopted for GMDSS, which are not available everywhere as explained in MSC/Circ.1038. There is some sense in that respect to separate public correspondence traffic from the GMDSS, including "operational radiocommunications", at least for those which are not distress, urgency and safety communications.

5 The proposed new definition of general communications in document NCSR 5/12 is:

"General communications means operational radiocommunications other than distress".

But the term "operational radiocommunications" covers a wide scope of communications with different priority levels.

6 The definition of "operational radiocommunications" according to paragraph 2.2.11 of the GMDSS Manual, (ed.2015) states:

"General radiocommunications in the GMDSS are those communications between ship stations and shore-based communication networks which concern the management and operation of the ship and may have an impact on its safety (regulation IV/2.1.5). These communications can be conducted on any appropriate channel, including those used for public correspondence. Examples are orders for pilot and tug services, chart replacement, repairs, etc."

7 Whereas the idea is to remove public correspondence from "general communications", the remaining parts of communication are urgency and safety communications. Then, operational radiocommunications under the scope of "general communications" should only have the priority levels of "urgency" or "safety". Any other operational radiocommunications should be covered by the new functional requirement "other communications".

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1 MSC/Circ.1038 Guidelines for general radiocommunications.
The Radio Regulations (RR) indicate in article 33 operational procedures for urgency and safety communications in the GMDSS:

"RR 33.1 § 1 1) Urgency and safety communications include: (WRC-07)
RR 33.2 a) navigational and meteorological warnings and urgent information;
RR 33.3 b) ship-to-ship safety of navigation communications;
RR 33.4 c) ship reporting communications;
RR 33.5 d) support communications for search and rescue operations;
RR 33.6 e) other urgency and safety messages; and
RR 33.7 f) communications relating to the navigation, movements and needs of ships and weather observation messages destined for an official meteorological service."

RR article 33.3 and RR article 33.4 cover ship-to-ship and shore-to-ship safety-related communications. RR article 33.5 is redundant with the functional requirements consisting in transmitting and receiving SAR communications, and on-scene communications. But RR article 33.5 can be understood also as safety-related communications to ships involved or not in the SAR operation. And RR article 33.6 can cover operational radiocommunications. It should also be clear to give the possibility from the shore to broadcast any safety-related information on short notice before any official MSI is issued. The introduction of "urgency" and "safety" in the 8th functional requirements of GMDSS would help the end-users understand that the two orders of priority of communications can be used.

As explained in separate document NCSR 5/11/3, "security-related communications" in SOLAS chapter IV would not ensure consistency with SOLAS chapter XI-2 and related instruments, and would impair the flexibility offered to Member States with regard to the means of transmitting and receiving security related information.

Conclusion

As a consequence, the term "urgency and safety communications" would not need to be defined as it may be referred to RR, and the functional requirements concerning safety-related communications would not be necessary. Additionally, the proposed definition of "other communications" in SOLAS regulation IV/2.1.11bis could be simplified as indicated in the annex.

The need for end users to have a clear understanding of the functional requirements should be taken into account. With the above simplification, GMDSS functional requirements would cover three orders of priority of communications: distress, urgency and safety communications.

The emergency phases of the International Convention on Maritime Search and Rescue, 1979 corresponding to a different order of priority level of communications should also clearly be reflected in the GMDSS functional requirements:

1. distress phase communications are covered by functional requirements 1, 2, 3, 4, 5 and 6; the current radiotelephony practice uses the phrase marker MAYDAY repeated three (3) times;

2. alert phase communications would be covered by functional requirements 7 (urgency MSI) and functional requirements 8 (ship-to-shore and ship-to-ships urgency communications); the current radiotelephony practice uses the phrase marker PAN PAN repeated three (3) times; and
.3 uncertainty phase communications would be covered by functional requirements 7 (MSI) and functional requirements 8 (ship-to-shore and ship-to-ships safety communications): the current radiotelephony practice uses the phrase marker SÉCURITÉ repeated three (3) times.

Proposal

14 For the reasons above, the co-sponsors propose the draft amendments to SOLAS chapter IV as indicated in the annex.

Action requested of the Sub-Committee

15 The Sub-Committee is invited to consider the proposal in paragraph 14, and take action as appropriate

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ANNEX

PROPOSITION OF AMENDMENTS TO SOLAS CHAPTER IV
(Based on revision recommended in documents NCSR 5/11 to NCSR 5/12, appendix 3 of the annex)

SOLAS IV/2.1.11bis:

Other communications means any telecommunication other than distress, urgency, and safety, general and security related communications.

SOLAS IV/4:

1 Every ship, while at sea, shall be capable of:
   .1 performing the global maritime distress and safety system (GMDSS) functions as follows:
      .1 transmitting ship-to-shore distress alerts by at least two separate and independent means, each using a different radiocommunication service;
      .2 receiving shore-to-ship distress alert relays;
      .3 transmitting and receiving ship-to-ship distress alerts;
      .4 transmitting and receiving search and rescue coordinating communications;
      .5 transmitting and receiving on-scene communications;
      .6 transmitting and receiving signals for locating;
      .7 transmitting and receiving safety related information;
      .7bis receiving Maritime Safety Information (MSI);
      .8 transmitting and receiving general urgency and safety communications; and
      .9 transmitting and receiving bridge-to-bridge communications.

   .2 transmitting and receiving security-related communications, in accordance with the requirements of the International Ship and Port Facility Security Code; and
   .32 transmitting and receiving other communications.