U.S. Department of Transportation
United States Coast Guard

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United States Coast Guard

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16700

MAR 10 1997

From: Commandant (G-MOC)
To: Distribution

Subj: MANNING REQUIREMENT EXEMPTION FOR VESSELS WITH GLOBAL MARITIME DISTRESS & SAFETY SYSTEM (GMDSS)

Ref: (a) Final Rule, Conforming the Maritime Service Rules to the Provisions of the Telecommunications Act of 1996, FCC 96-156, [61 FR 19558]
(b) International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended

1. In reference (a) the Federal Communications Commission established criteria for the exemption of U.S. passenger vessels and U.S. cargo vessels of 1,600 GT or more from the radiotelegraph provisions of Part II of Title III of the Communications Act, including the requirement for a Radio Officer when operating on an international voyage. For a vessel to qualify, it must fully comply with the requirements for the GMDSS contained in 47 CFR Subpart W, provided in enclosure (1), and the U.S. Coast Guard must determine that the vessel has the GMDSS equipment installed and in good working condition. Ships meeting these requirements may also qualify for an exemption from the radio direction-finding equipment carriage requirement found in regulation V/12(p) of reference (b).

2. The policy and guidance provided in enclosure (2) provides the necessary information to allow the OCMI to determine if a vessel has met the criteria for an exemption. It will eventually be incorporated into Chapter 9 of the Marine Safety Manual, Volume II, Material Inspection.

3. Enclosure (3) is an aid to assist in determining a vessel's compliance with the exemption requirements. Additional information on maritime sea areas for determining the areas of operations for U.S. ships is provided in enclosure (4).

4. Currently, most ships operating in the U.S. will meet the requirements for ships operating in sea area A3. The U.S. presently has no sea area A1, and will not have sea area A2 fully available until 1999. More information on sea areas and GMDSS, including the FCC rules contained in enclosure (1), may be obtained from the Office of Communications Systems, Spectrum Management Division (G-SCT-2) at (202) 267-2860, email: cgcomms@comdt.uscg.mil, or on the Internet at http://www.navcen.uscg.mil/marcomms/gmdss/gmdss.htm.

5. Questions regarding this policy should be directed to the Vessel Compliance Division, Commandant (G-MOC-2), at (202) 267-1464.

J.E. SCHRINNER
Captain, U.S. Coast Guard
Chief, Office of Compliance
By direction of the Commandant

Encl: (1) 47 CFR 80, Subpart W
(2) GMDSS Compliance Determination Policy
(3) USCG GMDSS Compliance Checklist
(4) Printout from USCG NAVCEN web site on maritime sea areas

Dist: all COTP's and OCMI's
all District(m)
National Maritime Center
Marine Safety School, RTC Yorktown
FCC's Wireless Telecommunications Bureau

Commandant (G-SCT-2)
U.S. Coast Guard 4 May 1996
Washington DC 20593

{Note: These are the U.S. Federal Communications Commission regulations concerning the Global Maritime Distress and Safety System (GMDSS), scanned from the October 1, 1995 edition of the Code of Federal Regulations, 47, Part 80 to End. Note that because this text was scanned, there may be errors in the text. If you see such errors, please notify us at the email address cgcomms@cgsmtp.uscg.mil.

FEDERAL COMMUNICATIONS COMMISSION REGULATIONS

47 CFR 80

Subpart W-Global Maritime Distress and Safety System (GMDSS)

SOURCE: 57 FR 9065, Mar. 16, 1992, unless otherwise noted.

This subpart contains the rules applicable to the Global Maritime Distress and Safety System (GMDSS). Every ship of the United States subject to part II of title III of the Communications Act or the Safety Convention must comply with the provisions of this subpart. The rules in this subpart are to be read in conjunction with the applicable requirements contained elsewhere in this part; however, in case of conflict, the provisions of this subpart shall govern with respect to the GMDSS. For the purposes of this subpart, distress and safety communications include distress, urgency, and safety calls and messages.

NOTE: No provision of this subpart is intended to eliminate, or in anyway modify, other requirements contained in this part with respect to part II of title III of the Communications Act.

J. Inspection For Manning Requirement Exemption For Vessels With GMDSS. In 1988, the international maritime community agreed to replace the radiotelegraph as the required installation with the Global Distress & Safety System (GMDSS), an automated ship-shore distress and safety radio communications system that relies on satellites and advanced terrestrial systems. Accordingly, the Federal Communications Commission (FCC) adopted rules implementing the international GMDSS requirements in 47 CFR 80 for U.S. vessels in 1992. Section 206 of the Telecommunications Act of 1996 eliminated the radiotelegraph carriage requirements for each GMDSS-equipped vessel. This includes removing the Radio Officer from a vessel's required manning, so long as the U.S. Coast Guard determines that the vessel has the GMDSS equipment installed and in good working condition.

1. Definitions.

a. Cargo Ship Safety Radiotelegraphy Certificate - a certificate issued after inspection of a cargo ship radiotelegraph station which complies with applicable Safety Convention radio requirements.

b. Cargo Ship - is defined as any ship that is not a passenger ship.

c. Cargo Ship Safety Radiotelephony Certificate - a certificate issued after inspection of a cargo ship radiotelephone station which complies with applicable Safety Convention requirements.

d. Global Maritime Distress and Safety System (GMDSS) - an International Maritime Organization (IMO) worldwide coordinated maritime distress system designed to provide the rapid transfer of distress messages from vessels in distress to units best suited for giving or coordinating assistance. The system includes standardized equipment and operational procedures, unique identifiers for each station, and the integrated use of frequency bands and radio systems to ensure the transmission and reception of distress and safety calls and messages at short, medium and long ranges.

e. Maritime Sea Areas - for the purposes of GMDSS requirements, a ship's area of operations is defined as follows:

(1) Sea area A1 - an area within the radiotelephone coverage of at least one VHF coast station in which continuous DSC alerting is available as defined by the International Maritime Organization (IMO).

(2) Sea area A2 - an area, excluding sea area A1, within the radiotelephone coverage of at least one MF coast station in which continuous DSC alerting is available as defined by IMO.

(3) Sea area A3 - an area, excluding sea areas A1 and A2, within the coverage of an INMARSAT geostationary satellite in which continuous alerting is available.

(4) Sea area A4 - an area outside sea areas A1, A2, and A3.

(5) Maritime sea areas are delineated in the International Maritime Organization Publication GMDSS Master Plan of Shore-Based Facilities (GMDSS Circ.7).

f. Passenger Ship - any ship that carries or is licensed or certificated to carry more than twelve passengers.

g. Passenger Ship Safety Certificate - a certificate issued by the Commandant of the Coast Guard after inspection of a passenger ship which complies with the requirements of the Safety Convention.

h. Safety Certificate - refers to a Cargo Ship Safety Radiotelegraphy Certificate, Cargo Ship Radiotelephony Certificate, or Passenger Ship Safety Certificate.

i. Safety Convention - the International Convention for Safety of Life at Sea, 1974, as amended , and the Annex thereto (SOLAS 74, as amended).

2. Applicability. This policy applies to each U.S. passenger ship and each U.S. cargo ship of 1,600 gross tons and upward.

3. GMDSS Compliance Determination. The OCMI shall check that a vessel meets the following requirements to make a determination whether a vessel has the required GMDSS equipment installed and in good working condition.

a. Safety Certificate. A vessel must carry a valid Safety Certificate. The Certificate must be posted in a prominent and accessible place on the ship.

b. GMDSS Licensed Operators. A vessel must carry at least two persons holding GMDSS Radio Operator's Licenses as specified in 47 CFR 13.2 for distress and safety radiocommunications purposes, one of whom has to be designated as the primary operator during an emergency.

c. Maintenance Requirements. Required GMDSS radio equipment must be maintained to provide the availability of the functional requirements and performance standards specified in 47 CFR 80. The ship's maintenance program should make explicit reference to GMDSS equipment to ensure on-board or shoreside plans are taken into account.

(1) On ships engaged on voyages in sea areas A1 and A2, the availability of functioning GMDSS equipment must be ensured by duplication of equipment, shore-based maintenance, or at-sea electronic maintenance capability, or any combination of these.

(2) On ships engaged on voyages in sea areas A3 and A4, the availability of functioning equipment must be ensured by using a combination of at least two of the following methods: duplication of equipment, shore-based maintenance, or at-sea electronic maintenance capability.

(3) Maintenance methods. The OCMI shall check the following for determining adequacy of the maintenance methods specified above.

(a) Duplication of Equipment. If duplication of Equipment is used, the vessel must meet the requirements in 47 CFR 80.1105(g).

(b) Shore-Based Maintenance. Demonstration of shore-based maintenance should be provided in the form of a contract or other agreement between the vessel and a shore-based electronics maintenance company. The ship's master is responsible for providing sufficient information to satisfy the OCMI. Means for enforcing this requirement are still being developed and are subject to change.

(c) At-Sea Electronic Maintenance Capability. A vessel using this method must carry at least one qualified GMDSS Radio Maintainer. GMDSS Radio Maintainer must hold one of the following licenses:

(i) GMDSS Maintainer's License.

(ii) GMDSS Operator's/Maintainer's License..

d. Scope of Inspection. The Federal Communications Commission will determine that a vessel has GMDSS equipment installed

and in good working condition. The inspection conducted by the Coast Guard to make a determination that a vessel meets the exemption requirements will include, at a minimum, the documentation check specified above in sections 13.F.3 (a) through (c). The OCMI may also check entries in the Radiotelephone Log to ensure GMDSS equipment has been tested demonstrating it to be capable of meeting all distress and safety functions prior to the ship departing each port, as required by 47 CFR 80.1105(e) and 80.409(e) and may ask the master how these tests are performed. The OCMI may also ask that the GMDSS operator to demonstrate an ability to communicate over at least two GMDSS systems, show that the NAVTEX and Inmarsat SafetyNET receivers are working, or show the EPIRB built-in test works. If the OCMI has any doubts or concerns about the technical adequacy of the GMDSS equipment installation, the suitability of electrical wiring to interconnect components of the equipment, or the proper maintenance and efficient operation of the GMDSS equipment, they should consult with the local FCC representative before taking further action.

4. Documentation. Once the OCMI has checked for compliance with the requirements specified above and made the determination that a vessel's GMDSS equipment is installed and in good working condition, the Radio Officer shall be removed from the required manning and the vessel's COI endorsed with the following:

"This vessel is equipped with GMDSS and shall be provided with a minimum of two persons who possess certificates issued to them from the Federal Communications Commission attesting to their qualification in the operation of GMDSS, and if the at-sea maintenance method is chosen, at least one person possessing a certificate issued to them from the Federal Communications Commission attesting to their qualification in the maintaining of GMDSS."

K. Exemption Requests from RDF Carriage Requirements. SOLAS 74 requires all vessels 1600 GT or greater, engaged on international voyages, to be fitted with a radio direction-finding (RDF) equipment. The OCMI/COTP may grant an exemption from this requirement to those U.S. ships that fully comply with the GMDSS requirements contained in 47 CFR Subpart W and have an operable GPS receiver installed.

1. Review for Exemption. Upon receipt of a request for an exemption from the RDF carriage requirements in SOLAS 74, the OCMI will check to ensure that the ship fully complies with the following requirements:

a. Compliance with GMDSS. The ship must be in full compliance with GMDSS requirements. A ship is considered in compliance with GMDSS requirements if it meets the criteria found in section J.3 of this chapter.

b. GPS Carriage. The ship must have an operable GPS receiver installed.

2. Issuance of Exemption. If the OCMI/COTP finds that a ship meets the requirements, an Exemption Certificate, form CG-967 will be issued granting the exemption. Once issued, the Exemption Certificate shall be attached to the applicable Safety Certificate (either the Cargo Ship Safety Equipment Certificate or Passenger Ship Safety Certificate). Appendix 13-A provides an example of a completed Exemption Certificate. The following information will be filled on the Exemption Certificate:

a. The authority for this exemption is regulation V/12(p).

b. The requirement that the ship is exempted from is regulation V/12(p).

c. The condition on which the Exemption Certificate is granted is: "This ship must comply with the GMDSS requirements found in Title 47, Code of Federal Regulations, Subpart W."

d. The Exemption Certificate will be valid until the Safety Certificate to which it is attached expires.

OMB APPROVAL THIS PAGE

EXEMPTION CERTIFICATE

Issued under the provisions of the

INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, 1974, as amended

under the authority of the Government of

THE UNITED STATES OF AMERICA

by the UNITED STATES COAST GUARD

Particulars of Ship

Name of Ship	Distinctive Number or Letters	Port of Registry
DURABLE	WRDS	ALTPORT, USA

Gross Tonnage	IMO Number (Note 1)
10,000	080000

THIS IS TO CERTIFY:

That this ship is , under the authority conferred by regulation V/10.2

of the Convention, exempted from the requirements of: Regulation V/10.2.1 requirement to be fitted with a radio direction-finding apparatus

of the Convention.

Note

1. In accordance with resolution A.600(15) IMO Ship Identification Number Scheme, this information may be included voluntarily.

EXEMPTION CERTIFICATE

Conditions, if any, on which the Exemption Certificate is granted: This ship must comply with the GMDSS requirements found in Title 47, Code of Federal Regulations, Subpart W.

Voyages, if any, for which the Exemption Certificate is granted: N/A

This certificate is valid until 31 DEC 00

subject to the Cargo Ship Safety Equipment Certificate.

to which this certificate is attached, remaining valid.

Issued at : Marine Safety Office Spotted Horse, Wyoming

Place of issue of Certificate

01 JAN 97

Date of issue

C. L. Shot, CAPT, USCG

Officer in Charge, Marine Inspection, U.S. Coast Guard

Unit:	**U.S. Coast Guard GMDSS Exemption Evaluation Checklist**	Date:

Vessel Name:	VIN:	MMSI:	Call Sign:

1. Documentation of Inspection. (47 CFR 80.1067)

☐ a. Has valid Safety Certificate Issue Date: _____ Expiration Date: _____

2. GMDSS Operators. (47 CFR 80.1073)

☐ a. Has at least 2 licensed GMDSS Operators (1) License #. _____ Expiration Date: _____

(2) License #: _____ Expiration Date: _____

3. Maintenance Requirements. (47 CFR 80.1105)

a. engages in voyages in:

☐ (1) Areas A1 and A2
if checked, ship must ensure availability is maintained by at least one of the methods listed in 3.b.

☐ (2) Areas A3 and A4
if checked, ship must ensure availability is maintained by at least two of the methods listed in 3.b

b. has at least one or two of the following (as applicable):

☐ (1) duplication of equipment (complies with 47 CFR 80.1105(g))

☐ (2) demonstration of shore-based maintenance:

Company's name: _____ Effective Date: _____

Address: _____ Expiration Date. _____

_____

_____

(3) at-sea electronics maintenance capability

☐ (a) Has qualified GMDSS Radio Maintainer. Personnel holds one of the following licenses:

☐ - GMDSS Radio Maintainer's License

☐ - GMDSS Radio Operator Maintainer's License

4. GPS Requirement (for RDF exemption only)

☐ a. Vessel is equipped with an operable GPS receiver

5. Determination:

☐ a. According to the information provided above, the ship in question meets / does not meet (*circle one*) the requirements for an exemption.

GMDSS and Search and Rescue Areas

Global Maritime Distress and Safety System Sea Areas

GMDSS sea areas serve two purposes: to describe areas where GMDSS services are available, and to define what GMDSS ships must carry. Prior to the GMDSS, the number and type of radio safety equipment ships had to carry depended upon its tonnage. With GMDSS, the number and type of radio safety equipment ships have to carry depend upon the areas in which they travel. GMDSS sea areas are defined by governments.

In addition to equipment listed below, all GMDSS-regulated ships must carry a satellite EPIRB, a NAVTEX receiver (if they travel in any areas served by NAVTEX), an Inmarsat-C SafetyNET receiver (if they travel in any areas not served by NAVTEX), a DSC-equipped VHF radiotelephone, a VHF handheld, and a search and rescue radar transponder (SART)

Sea Area A1

An area within the radiotelephone coverage of at least one VHF coast station in which continuous digital selective calling (ch70) alerting and radiotelephony services are available, as defined by the International Maritime Organization.

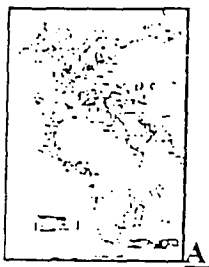
Sea Area A2

An area, excluding sea area A1, within the radiotelephone coverage of at least one MF coast station in which continuous DSC (2187.5 kHz) alerting and radiotelephony services are available, as defined by the International Maritime Organization. GMDSS-regulated ships travelling this area must carry a DSC-equipped MF radiotelephone in addition to equipment required for Sea Area A1.

A1/A2 Areas in N. and S. America

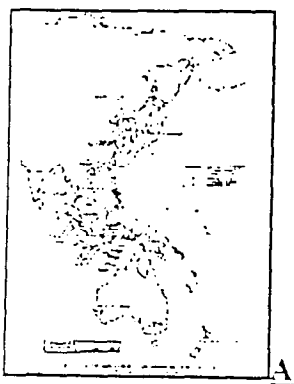
21kb gif file.

ENCLOSURE (4)



A1/A2 Areas in Europe and Africa

36kb gif file



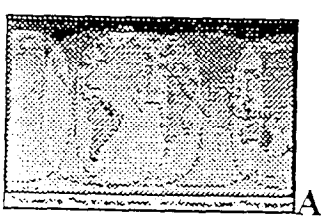
A1/A2 Areas in Asia and W. Pacific

27kb gif file

Solid lines represent actual service areas and dashed lines planned service areas.

Sea Area A3

An area, excluding sea areas A1 and A2, within the coverage of an INMARSAT geostationary satellite in which continuous alerting is available. Ships travelling this area must carry either an Inmarsat A, B or C ship earth station, or a DSC-equipped HF radiotelephone/telex, in addition to equipment required for an A1 and A2 Area.



A3 (Inmarsat) Area

48kb gif file

Sea Area A4

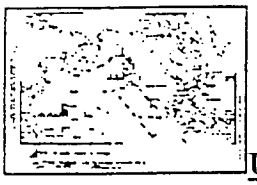
The area outside that covered by areas A1, A2 and A3 is called Sea Area A4 Area. Ships travelling these polar regions must carry a DSC-equipped HF radiotelephone/telex, in addition to equipment required for areas A1 and A2.

Search and Rescue Areas

ENCLOSURE (4)

These show the nation or rescue coordination center responsible for coordinating distress emergencies which occur in these areas. Search and rescue areas are still undefined in many ocean regions.

United States Search and Rescue Area


U.S. SAR Areas of Responsibility

39kb gif file

Atlantic Search and Rescue Area


Atlantic SAR Areas of Responsibility

31kb gif file

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return to GMDSS

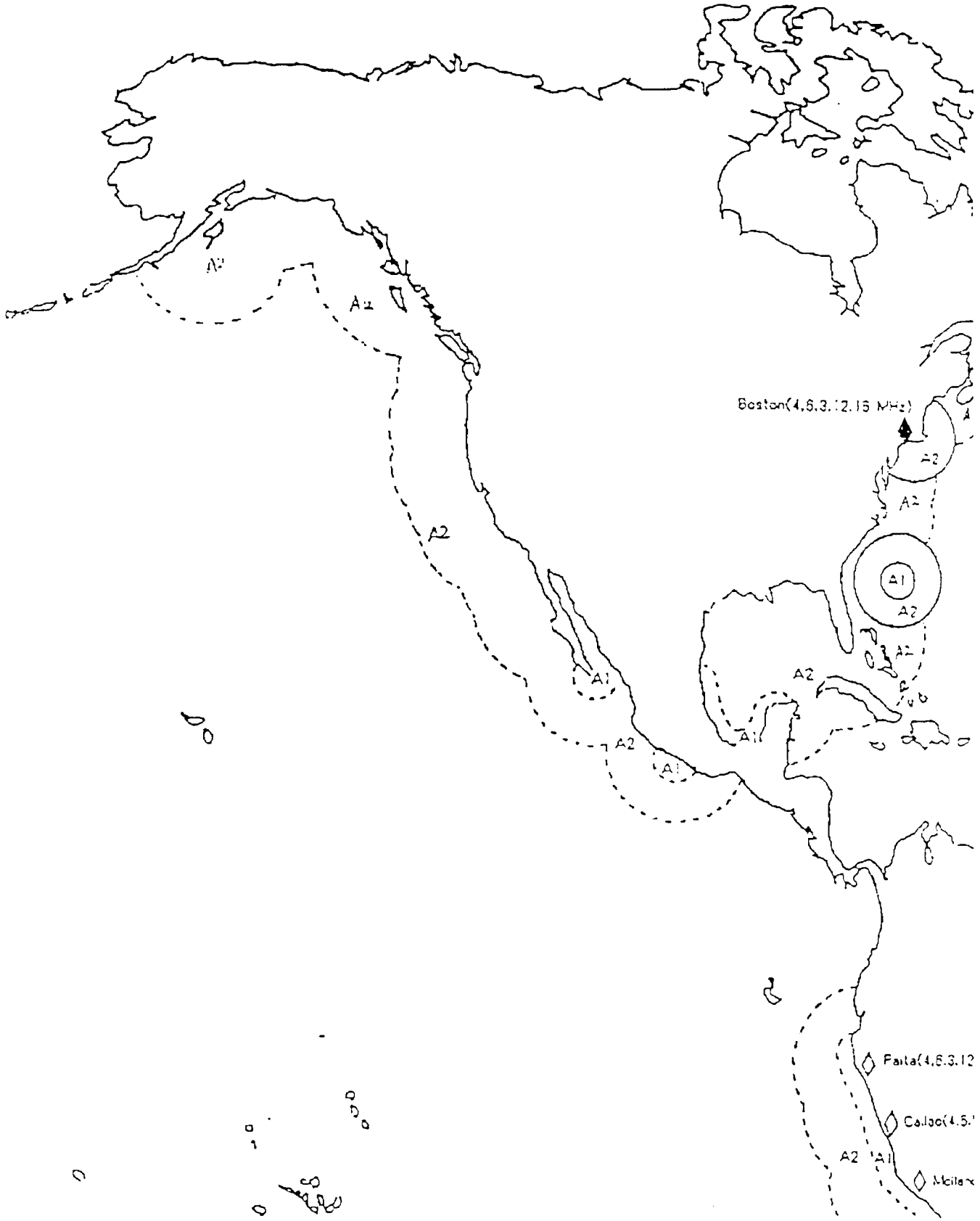
return to Maritime Communications

return to NAVCEN homepage

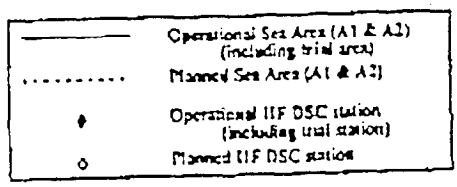
Last Revised: 6 May 1996

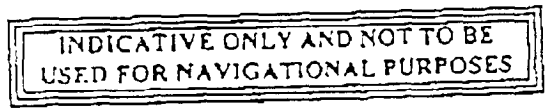
Commandant (G-SCT-2)
U.S. Coast Guard
Washington DC 20593

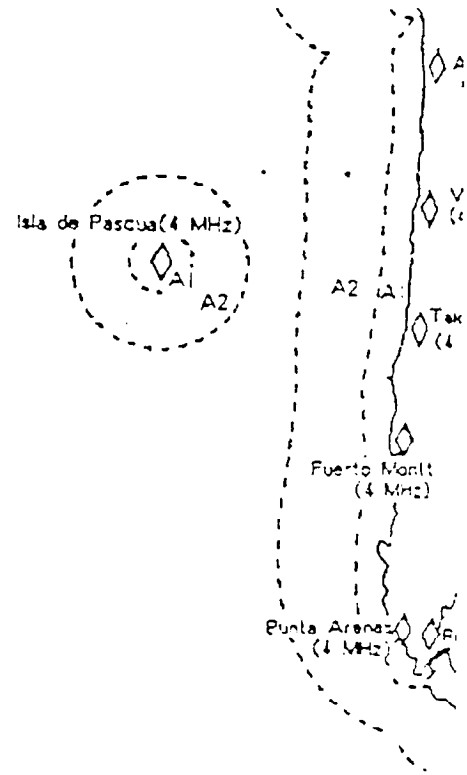
ENCLOSURE (4)


A2
A2
A2
Boston(4,6,8,12,16 MHz)
A2
A2
A1
A2
A2
A2
A1
A2
A1
A1
Paita(4,6,8,12
Callao(4,6,
A2
A1
Mollen

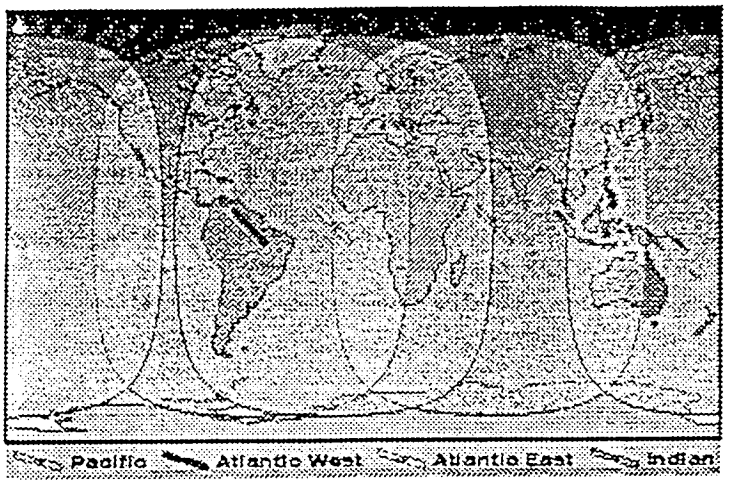
ENCLOSURE (4)


Operational Sea Area (A1 & A2)
(including trial area)
Manned Sea Area (A1 & A2)
Operational HF DSC station
(including trial station)
Manned HF DSC station


INDICATIVE ONLY AND NOT TO BE
USED FOR NAVIGATIONAL PURPOSES


Isla de Pascua(4 MHz)
A1
A2
A2
A1
Puerto Montt
(4 MHz)
Punta Arenas
(4 MHz)

ENCLOSURE (4)



ENCLOSURE (4)