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CG-CVC Policy Letter
15-06

DEC 15 2015


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To: Distribution

Subj: VHF-DSC RADIO EQUIPMENT INSTALLATION REQUIREMENT FOR
INSPECTED PASSENGER AND COMMERCIAL FISHING VESSELS

Ref: (a) 47 Code of Federal Regulations (CFR) 80.905(a)(1)
(b) 46 CFR 121.502
(c) 46 CFR 184.502
(d) 28 CFR 28.245

1. PURPOSE. This policy letter provides guidance to Officers in Charge Marine Inspection (OCMI)s and Commercial Fishing Vessel Examiners (CFVE)s on how to verify the installation of required, Very High Frequency (VHF) radios with Digital Select Calling (DSC)¹ capabilities, on inspected domestic passenger vessels and commercial fishing vessels to ensure compliance with reference (a).
2. DIRECTIVES AFFECTED. None.
3. BACKGROUND. On April 16, 2015, the Federal Communications Commission (FCC) released Public Notice DA 15-466 announcing the new radio equipment installation requirements for certain commercial vessels. Inspected domestic passenger vessels that carry more than six passengers, with at least one for hire, and commercial fishing vessels of 300 gross tons and upward must be equipped with a VHF-DSC radio installation beginning one year after the United States Coast Guard (CG) notified the FCC that shore-based Sea Area A1 coverage has been established.² On January 20, 2015, the CG notified the FCC that it had published a Federal Register notice declaring Sea Area A1 to be within twenty nautical miles seaward of the territorial baseline along the East, West, and Gulf coasts of the United States, excluding Alaska, but including Hawaii, Puerto Rico, Guam, the Virgin Islands of the United States, and the Northern Mariana Islands of Saipan, Tinian, and Rota.³ This determination was made because the Coast Guard now has service, in Sea Area A1, under its Rescue 21 Distress System coverage. Consequently, and in accordance with reference (a), passenger and commercial fishing vessels operating in those water must upgrade to VHF-DSC equipment no later than **January 20, 2016**.⁴
4. DISCUSSION. In accordance with references (b), (c), and (d), a vessel must comply with the applicable requirements for any radio installation, including the requirements for a station license and installation certificates to be issued by the FCC as set forth in Title 47 Code of Federal Regulations (CFR) Part 80. Vessels that operate solely within 20 nautical miles of land must be equipped with a radiotelephone installation that conforms to the appropriate performance standards in § 80.1101(c)(2). Part of that compliance includes a vessel

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inspection by a FCC-licensed technician who conducts a detailed inspection of radio installations, in accordance with § 80.59, and verifies compliance with the Communications Act regulations. During Coast Guard inspections for certification or re-inspections, the Coast Guard verifies that vessels have on board a valid Safety Radiotelephone Certificate issued by the FCC.

5. **ACTION.** After January 20, 2016, Coast Guard Marine Inspectors (MIs) and CFVEs should ensure the proper installation of the VHF-DSC radio through visual inspection of the equipment during the vessel's next scheduled inspection or examination. Typically, the DSC alert button is red and is marked with "DSC" or "Distress" on the front radio panel.⁵ While the MI or CFVE may conduct an operational test of the radio equipment⁶, they are not required to test the functionality of the radio's DSC alert feature. If there are doubts or concerns about the adequacy of the equipment installation, the suitability of electrical wiring connecting components, or the proper maintenance of the equipment, the local FCC technician should be consulted before taking further action.

If compliance with reference (a) cannot be verified, MIs should issue a deficiency (CG-835) to the vessel for failing to upgrade the VHF radio by the effective date (January 20, 2016). MIs should not issue a "no sail" for this deficiency but ensure operators are proactively seeking compliance with this requirement (e.g., providing a receipt for the VHF-DSC radio purchase or evidence of a scheduled radio installation). CFVEs should note the deficiency in the Commercial Fishing Vessel Safety Examination Booklet (CG-5587) and not issue the Commercial Fishing Vessel Safety Decal until installation of the radio equipment can be verified. NOTE: A Boarding Officer may issue a Notice of Violation (NOV) to a commercial fishing vessel for this deficiency but should not terminate the voyage unless other circumstances are present that warrant a voyage termination due to additional safety concerns in accordance with part C.1.b.2 of the MLEM.

6. **QUESTIONS.** Questions concerning this policy and guidance should be directed to the Office of Commercial Vessel Compliance at CG-CVC-1@uscg.mil or (202) 372-1251.

¹ DSC is an internationally approved system for automatically contacting vessels. It allows mariners to instantly send an automatically formatted distress alert to rescue authorities anywhere in the world, and to initiate or receive distress, urgency, safety and routine radiotelephone calls to or from any similarly equipped vessel or shore station without either party being near a radio loudspeaker. DSC also allows ship and shore stations to call each other directly, rather than requiring a radio operator to continuously monitor a common calling channel to identify the specific caller.

² Sea Area A1 is an area within the radio coverage of at least one VHF Coast Station in which continuous DSC alerting is available as defined by 47 CFR § 80.1069(a)(1).

³ This determination was based upon the performance of the USCG Rescue 21 System, and in accordance with applicable provisions of the International Convention for the Safety of Life at Sea, 1974. Rescue 21 is the Coast Guard's advanced command, control and direction-finding communications system that was created to better locate mariners in distress. It is comprised of strategically placed VHF Coast Stations that provide a continuous watch on DSC Channel 70 for receiving and responding to digital distress signals. In addition to declaring Sea Area A1 along the designated coasts, the USCG informed mariners that the Rescue 21 System also provides VHF Coast Stations along the Great Lakes, and that Rescue 21 facilities are being built along the Western Rivers and in Alaska. See *Declaration of Sea Area A1, 80 Fed. Reg. 2722, 2723 (2015)*.

⁴ Vessels with a VHF-DSC radio must maintain a watch on DSC channel 70 in addition to the radio watch requirements for channel 16 and for broadcasts of maritime safety information. See *47 CFR § 80.1085(a)(2)*.

⁵ VHF-DSC radios are fitted with a dedicated red distress or emergency button. The button requires two separate and independent actions to activate a distress call. This usually involves lifting the hinged flap over the button and holding the button down for a short period.

⁶ To conduct an operational test means to observe that the radio operator is able to (1) make contact with another vessel or a coast station on VHF Marine Channel 16 (156.8 MHz); (2) move to a VHF frequency and reestablish contact with the vessel or coast station; and (3) obtain a signal report from the other vessel or coast station which indicates that communications capability exists. See *Coast Guard/FCC MOU dated 10 July 1984*.