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MOC Policy Letter
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# MEMORANDUM

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Reply to
Attn of: G-MOC-1

To: Distribution

Subj: GLOBAL MARITIME DISTRESS AND SAFETY SYSTEM (GMDSS) OPERATOR REQUIREMENTS

Ref: (a) Marine Safety Manual (MSM) Volume II Section E. Chapter 2.K
(b) 46 Code of Federal Regulations Part 15.1103(f)

1. Purpose. The GMDSS operator requirements changed on 31 January 2002, upgrading the requirement for GMDSS operators from "two deck officers" to "the Master, Chief Mate, and all other officers of a navigation watch." This letter aligns Coast Guard policy with changes to reference (b) regarding GMDSS operators reflected on Certificates of Inspection (COI). Until a similar amendment can be made to reference (a), adherence with this policy letter is necessary to ensure consistency between OCMI practice and the published regulations.

2. Directives Affected. Reference (a) is temporarily augmented by this policy letter.

3. Discussion. Since reference (a) was published, the shipboard radio operator requirements mandated in reference (b) have changed. Paragraph K.3.b and K.4 of reference (a) required two GMDSS operators. This requirement changed after 31 January 2002 making those portions of reference (a) obsolete. Additionally, a technical error was corrected in paragraph K.2 changing applicable gross tonnage (GT) from 1600 GT to 300 GT as reflected in NVIC 3-99 and SOLAS Chapter IV. Currently, GMDSS equipped vessels may not be crewed by a Master, Chief Mate or officer of a navigation watch unless they hold appropriate certification as GMDSS operators. Additionally, the COI format was upgraded to record this new personnel requirement.

4. Action. Effective immediately, Marine Safety Offices, Activities, and other Marine Safety units shall apply the standards of enclosure (1) to all GMDSS equipped vessels as appropriate. Eventually, enclosure (1) will permanently replace the current reference (a).

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Enclosure (1) Draft change to reference (a)

Distribution: Marine Safety Center
All MSOs/MIOs/Activities
Area (m) Offices
District (m) Offices

## A. GENERAL PROCEDURES

## K. 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 Maritime 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

Cargo Ship Safety Radio Certificate

a. Cargo Ship Safety Radio Certificate: a certificate issued after inspection of a cargo ship radio communications equipment which complies with applicable Safety Convention radio requirements.

Cargo Ship

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

Global Maritime Distress and Safety System (GMDSS)

c. 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.

Maritime Sea Areas

d. 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 geo-stationary 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).

Passenger Ship

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

Passenger Ship Safety Certificate

f. 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; including radio communications equipment.

## 2. Applicability

This policy applies to each U.S. passenger ship and each U.S. Cargo Ship of 300 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.

Cargo Ship Safety Radio Certificate

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

GMDSS Radio Operators

b. GMDSS Radio Operators. A person may not be employed as a Master, Chief Mate or officer of a navigation watch unless they hold the appropriate GMDSS operator certification as specified in 47 CFR 13 and 46 CFR 15.1103 for distress and safety radio communications purposes.

Maintenance Requirements

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 shore8ide plans are taken into account.

(1) On ships engaged on voyages in sea areas Al 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 Ships 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) FCC GMDSS Radio Maintainer's License.

(ii) Merchant Mariner's Document (MMD).

(iii) Appropriately endorsed STCW certificate

Scope of Inspection

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 MSM II, E2.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 any 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**

The vessel manning portion of COIs for vessels equipped with GMDSS shall reflect the total number of GMDSS operators required based upon the number of officers standing navigation watches in addition to the Master and Chief Mate. (E.g. for a typical three watch system on a deep draft vessel there should be 4 GMDSS operators (Chief Mate +Second Mate +Third Mate + Master = 4)). This may vary from vessel to vessel, therefore, COIs should be independently verified. There is no requirement for additional endorsements for GMDSS operators (including "at-sea maintenance") in the operating details of the COI.