Re: Comments on IFC 28/2018 - Remaking the Marine Radio Standard

Thank you for the opportunity to comment on IFC 28/2018 - Remaking the Marine Radio Standard (Note: I was formerly with AMSA and Chair of the Joint AS/NZS standards committee RC-004 a few years ago, so had some involvement with the standards referenced.)

General
I would like to express support for the adoption of the proposed ETSI standards as set out in the Draft Radiocommunications (VHF) Radiotelephone Equipment - Maritime Mobile Service Standard 2018. It is good to see that a solution has been found for the ongoing status of the AS/NZS 4415.1/2 VHF radio test standards also.

This was a project commenced some years ago, and since that time, there have important changes to Recommendations ITU-R M.493 and 541 (versions -14 and -10 respectively) referenced in the ETSI standards. These standards have been incorporated by reference in the ITU Radio Regulations, which include, amongst other changes, new Digital Selective Calling (DSC) Class-M equipment and Class-H equipment. The ETSI standards referred to are effectively de facto international standards for this type of equipment.

Comment (1)
According to the ETSI standards portal, the EN 302 885 version which is current is V2.2.3 (2017-04), as against the V2.2.2 (2017-03) which is shown on the 'Remaking the Marine Radio Standard' web-page. The V2.2.2 (2017-03) is the ETSI standard on which the recently published (17 May 2018) AS/NZS ETSI 302 885:2018 is based.

Comment (2)
'Remaking the Marine Radio Standard' web-page contains the following (last paragraph):

2 Digital Selective Calling (DSC) is a standard for sending pre-defined digital messages via the medium frequency (MF), high-frequency (HF) and very-high-frequency (VHF) maritime radio systems.

Although this is true, the other purposes of DSC are to assist in establishing subsequent communications (voice only, in the case of VHF DSC) with the station, indicating the priority of the initial DSC call (Distress Alert, Urgency/Safety Announcement or routine), identification of the calling station via its maritime mobile service identity (MMSI), and if available, the position of the calling station, as well as the time at which it was valid.

Editorial
Section 7 Note 1: (h) Insert the word 'station' after '...rescue' to read '...rescue station..' for consistency.

Schedule 1, Part 2 (Table), Item 2.7, amend 'Clause 5.21' to read 'Clause 5.2.1'.
Comment (3)

There is inclusion of limited coast assigned system station under (a) in Part 2 (Interpretation) of the Draft standard, as well as other types of limited coast stations. In order to remove any doubt as to the status of existing limited coast stations of all types, is there a case for some reference to stations that have been established that are compliant with AS/NZS 4295:2015, Analogue speech (angle modulated) equipment operating in land mobile and fixed services bands in the frequency range 29.7 MHz to 1 GHz?

The last revision of AS/NZS 4295 in 2015, via Committee RC-006 amended Clause 1.1 (Scope), but adding coast stations under ‘Scope (e): coast stations in the VHF maritime mobile service’. This amendment acknowledged the reality that many limited coast stations were in fact using land mobile equipment in Australia.

Accordingly, should there be some reference to AS/NZS 4295:2015 in the s162 standard which relates to coast stations (limited or otherwise)? In reality in Australia, there are many limited coast stations (various types), assigned and non-assigned, which are in reality VHF land mobile base stations with 50 watt transmitter output. Some of these stations are used in conjunction with DSC controllers which should be compliant with the relevant coast station functions in the aforementioned ITU-R Recommendations.

I trust that this contribution will be helpful.

Yours Sincerely,

Peter Pokorny