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Agenda item 16

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## NAVIGATION, COMMUNICATIONS AND SEARCH AND RESCUE

### Increased operating costs related to the dissemination of Maritime safety information over multiple recognized mobile satellite services

Submitted by Canada, France and the United States

#### SUMMARY

*Executive summary:* This document comments on document MSC 102/16 (Report of NCSR 7) regarding cost implications related to multiple recognized mobile satellite services and proposes solutions to mitigate them

*Strategic directions, if applicable:* 2 and Other work

*Outputs:* 2.10 and OW 6

*Action to be taken:* Paragraph 11

*Related documents:* Resolutions MSC.451(99), A.707(17) and A.1001(25); MSC.1/Circ.1414; NCSR 7/14/3, NCSR 7/14, NCSR 7/9/2, NCSR 7/23; NCSR 6/23, NCSR 6/11/3, NCSR 6/9; NCSR 5/14/1, NCSR 5/WP.5; NCSR 4/29, NCSR 4/18/3, NCSR 4/12/2, NCSR 4/12/1, NCSR 4/INF.9; NCSR 3/29; NCSR 1/12 and COMSAR 15/3/4

#### Introduction

1 This document is submitted in accordance with 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/Rev.1) and comments on document MSC 102/16 (Secretariat).

2 The NCSR Sub-Committee, at its seventh session, invited the Committee to note the discussion on cost implications related to the dissemination of Maritime safety information (MSI) over multiple recognized mobile satellite services and, in particular, that the Sub-Committee invited interested Member States and international organizations to submit relevant proposals to the Committee, as this was considered to be a policy issue (MSC 102/16, paragraph 2.7).

## Background

3 The World-Wide Navigational Warning Service (WWNWS) and Worldwide Met-Ocean Information Warning Service (WWMIWS) currently use one recognized mobile satellite service provider to promulgate MSI. At NCSR 1 in 2014, Iridium submitted its proposal for recognition in the GMDSS (NCSR 1/12) and, in 2018, MSC 99 formally recognized Iridium as a mobile satellite service provider within the GMDSS (resolution MSC.451(99)). As far back as COMSAR 15, Member States learned that challenges would eventually exist with multiple recognized mobile satellite service providers. IMO and Member States confronted the challenges and attempted to resolve most concerns. However, the concern with rising costs to MSI providers remained and remains unresolved. It is unfair to Iridium, MSI providers and future mobile satellite service providers that there is not a solution to address additional costs when the safety of life at sea is at stake.

4 The Technical Working Group at COMSAR 15 first addressed the impact of additional recognized mobile satellite service providers when it considered documents COMSAR 15/3/4 and COMSAR 15/INF.2. In document COMSAR 15/WP.5, it discussed the Thuraya Satellite System with respect to the scoping exercise, to establish the need for a review of the elements and procedures of the GMDSS. The Technical Working Group concluded that "the inclusion of additional satellite system providers in the GMDSS could involve satellite coverage other than that defined for the existing sea areas which would then impact on interworking, carriage requirements and promulgation of MSI and SAR coordination".

5 Document NCSR 4/12/1 addressed the technical discussions of the GMDSS Modernization Plan. It recognized that resolution A.1001(25) on *Criteria for the provision of mobile satellite communication systems in the Global Maritime Distress and Safety System (GMDSS)* and MSC.1/Circ.1414 on *Guidance to prospective GMDSS satellite service providers* needed to be revised to take account of the recent experience gained from the review of GMDSS satellite service provider applications (NCSR 3/29, paragraphs 11.8 and 11.13.3, and annex 7, paragraphs 2.1 and 15.3). The document recommended to exercise caution with these revisions and considered that the revision of resolution A.1001(25) should not be completed prior to the revisions of SOLAS chapter IV in relation to the GMDSS Modernization Plan. Resolution A.1001(25), paragraph 2.2.2.2 of the annex, references charging policies and provisions (resolution A.707(17)) for which Governments should provide evidence to show compliance. Further, documents NCSR 4/29, annex 11, paragraph 31, and NCSR 4/29, annex 11, appendix 3, paragraph 17.36, both recommend to modernize GMDSS with a view to constraining costs. Both references state that "possible ways for MSI providers to provide and monitor MSI broadcasts over multiple GMDSS satellite service providers should be identified with a view to minimizing or not increasing the cost for MSI providers".

6 In document NCSR 5/WP.5, the Communications Working Group addressed agenda item 11 on Revision of SOLAS chapters III and IV for the modernization of the GMDSS. Specifically, paragraph 3.1.5 noted that resolution A.707(17) on *Charges for distress, urgency and safety messages through the Inmarsat system*, as well as ITU-T Recommendation D.90 on *Charging, billing, international accounting and settlement in the maritime mobile service* required revision. The Group recognized that this work was beyond IMO's remit and noted the view that the charging arrangements on distress communications could better be reflected in a new IMO instrument.

7 Document NCSR 6/WP.5, annex 1, paragraph 15, discussed the cost of multi-satellite service providers and how increasing costs were likely unavoidable. It recommended a burden-sharing model to adopt a centralized billing structure with recognized mobile satellite service providers, which would distribute the cost of worldwide MSI broadcasts among all IMO Member States. Document NCSR 6/11/3 attempted to address the consequences of additional

satellite service providers in the GMDSS. It reviewed the existing arrangements for exempting certain classes of radio traffic from charges and it aimed to promote a common basis for charging exemptions in the future. In this context, the Sub-Committee noted the concerns expressed by a number of delegations regarding cost implications with the introduction of new mobile satellite service providers. The Sub-Committee referred this document to the Communications Working Group for consideration during the review of resolution A.707(17). However, in document NCSR 6/23, there does not seem to be any reference to a review of this resolution other than referring it to the Communications Working Group.

8 Finally, document NCSR 7/9/2 addressed the cost of MSI again. In paragraph 18.2, "Action requested of the Sub-Committee", it asked the Sub-Committee to "acknowledge the concerns raised by the NAVAREA Coordinators on the cost issues and consider what methodology could be developed to share the funding burden across the wider IMO community". As noted in document NCSR 7/23, paragraphs 9.21 to 9.24, the Sub-Committee considered the cost implications and concluded that this was mainly a policy issue and agreed to refer the matter to the Committee for consideration and invited interested Member States and international organizations to submit proposals to the Committee, as appropriate.

### Recommendations

9 Member States and IMO worked diligently, deliberately and intentionally for the last decade to modernize the GMDSS. While it progressed many of those initiatives and proposals, the issue concerning the increase in cost for MSI providers did not have the same success, although not due to a lack of effort to address it and raise awareness. Currently, the plan seems to be that the existing 21 countries, which serve as NAVAREA and METAREA Coordinators, will assume the associated cost increases to disseminate and promulgate MSI. Additionally, there is no guidance to limit the number of recognized mobile satellite service providers, which is a significant concern. There are some NAVAREA and METAREA Coordinators that cannot support the current plan as a viable solution.

10 This document proposes three potential solutions, which could be forwarded to NCSR 8 to fully review them and potentially develop other alternatives, in order to mitigate the cost impacts to MSI providers and facilitate a smooth transition for new recognized mobile satellite service providers as they become part of the GMDSS:

- .1 Cost sharing: IMO distributes the cost of MSI promulgation equitably across all Member States. This would only apply to MSI promulgated by a recognized mobile satellite service provider, not NAVTEX. The Committee may invite proposals to NCSR 8 for approaches to distributing costs.
- .2 Amend resolution A.707(17): Eliminate the shore-to-ship charge for navigational and meteorological warnings.
- .3 Cost ceiling: Establish an annual cost ceiling for MSI promulgation for NAVAREAS and METAREAs, respectively. That cost ceiling would include message dissemination, installation and maintenance. As new recognized mobile satellite service providers become part of the GMDSS, they, as a group, would adjust costs to remain within the IMO approved MSI cost ceiling for NAVAREA and METAREA information providers.

**Action requested of the Committee**

- 11 The Committee is invited to:
- .1 take note of the information provided in this report;
  - .2 acknowledge the concerns raised by MSI providers with respect to emergent higher operating costs;
  - .3 consider this matter and refer it back to the NCSR Sub-Committee for further advice; and
  - .4 take any other action, as appropriate.
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