**S-98 Feedback – Sperry Marine, User Specified Distances**

**Proposed Changes**

User-specified distance references in Para C-4-2.3 and C-4-2.7:

a)       The references in Para C-4-2.3 and C-4-2.7 to “the limit of check area around the route” are imprecise/ambiguous because the referenced paragraph in MSC 232(82) 11.3.5 specifies *two*user-specified distances (i.e. Special condition & prohibited areas, and navigational hazards). Given neither IMO nor IEC 61174 mandate these *two*user-specified distances to be identical it is unclear which distance is being referred to. (It’s recognised that Special condition & prohibited areas have no depth attribute, but equally only a subset of “navigational hazards” have a depth attribute so the potential for confusion remains.) To further complicate matters, MSC.530(106) 11.3.4 introduces a *third*user-specified distance for the safety contour which is permitted to be different to the two user-specified distances in 11.3.5, so there are potentially three different safety checking corridors when planning, one for each user-specified distance. There is no requirement to display the corridors graphically and no harmonised way of doing so.

b)      WLA option 3 is applied to the “navigational hazard” safety checking corridor only, which may be either a sub-set or a super-set of the other two safety checking corridors. The result for mariners could be confusing, and lacking in harmonisation between different ECDIS.

c)       It’s difficult to see a use-case for the  safety contour and the “navigational hazards” user-specified distances being different, and easy to see that WLA applies to both

d)      Furthermore, MSC 232(82) 11.3.5 applies to route planning only, and MSC.530(106) 11.4 has no less than six different safety checking related user-specified distances for route monitoring, with no requirement for any of these distances to be the same as any other, and no requirement that they are the same as the distance used when route planning. The distances are:

i)        11.4.3: Own ship look-ahead: Distance from the **safety contour**

ii)       11.4.4: Own ship look-ahead: Distance from the boundary of a user-selectable category of **prohibited area or of a geographical area for which special conditions exist**

iii)     11.4.6: Own ship look-ahead: Distance from a user-selectable category of **danger** (e.g. obstruction, wreck, rock) that is shallower than the mariner's safety contour or a user-selectable category of **aid to navigation**

iv)     11.4.7: Current or the next leg: Distance from the **safety contour**

v)       11.4.8: Current or the next leg: Distance from a user-selectable category of **danger** (e.g. obstruction, wreck, rock) that is shallower than the mariner's safety contour or a user-selectable category **of aid to navigation**.

vi)     11.4.8: Current or the next leg: Distance from a user-selectable category of **point** objects, such as a fixed or floating aid to navigation or isolated danger.

e)      Recommendation:

i)        The references in Para C-4-2.3 and C-4-2.7 to MSC 232(82) 11.3.5 should clarify which user-specified distance is referenced, as follows:

ii)       Proposal for Para C-4-2.3:

(1)    “A distance parameter, as described below ~~the limit of the check area as specified by IMO MSC 232(82) 11.3.5.~~”

(2)    Add below “When route planning, the same user-specified distance shall be applied to both own ship's safety contour and the user-selectable category of point objects, and the distance parameter referenced above shall be this distance ~~limit of the check area as specified by IMO~~ ~~MSC 232(82) 11.3.5~~ Ref MSC.530(106) 11.3.4 and 11.3.5. When route monitoring, the same user-selected distance shall be applied to both the safety contour and the user-selectable category of danger (e.g. obstruction, wreck, rock) that is shallower than the mariner's safety contour or user-selectable category of aid to navigation, and the distance parameter referenced above shall be this distance Ref MSC.530(106) 11.4.3 and 11.4.6.”

iii)     Proposal for Para C-4-2.7:

(1)    Replace “… as specified by Para C-4-2.3 ~~IMO MSC 232(82) 11.3.5~~.” in two instances.

3.       Para C-4-2.7 allows WLA to be applied to a monitored route using a time from a planned schedule that does not pertain to the actual schedule. This could lead to an unsafe condition where the water leval applied may be incorrect and the mariner is unaware of the situation.

a)       Recommendation: Add after the first two bullets “When WLA is based on the planned schedule and own ship is not keeping to schedule a Caution shall be raised to indicate the water level being experienced may be different to that being applied by the ECDIS.”