

Recognition of Iridium mobile satellite system as a GMDSS service provider

Submitted by IHB

SUMMARY

Executive Summary: This document provides up-date details of the application for consideration of Iridium Satellite LLC to become a Global Maritime Distress and Safety System (GMDSS) mobile satellite services provider, which are relevant to WWNWS-SC

Action to be taken: Paragraph 2.

Related documents: NCSR 2/8 dated 16 December 2014

1. See attached document.
2. The Sub-Committee is invited to note the information provided and take action as appropriate.

SUB-COMMITTEE ON NAVIGATION,
COMMUNICATIONS AND SEARCH AND
RESCUE
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**ANALYSIS OF DEVELOPMENTS IN MARITIME RADIOCOMMUNICATION SYSTEMS
AND TECHNOLOGY**

Recognition of Iridium mobile satellite system as GMDSS service provider

Submitted by France and Spain

SUMMARY

Executive summary: This document includes the concerns expressed by Spain and France during the discussions at MSC 94 on the application to recognize and use the Iridium mobile satellite system in the GMDSS and following the suggestion of the Committee that issues which could not be directly related to the assessment of compliance with the criteria set out in resolution A.1001(25) should be submitted to the NCSR Sub-Committee for further consideration

Strategic direction: 5.2

High-level action: 5.2.5

Planned output: 5.2.5.3

Action to be taken: Paragraph 4

Related documents: MSC 94/21, MSC 94/9/3; NCSR 1/28 and NCSR 1/12/2

Introduction

1 During MSC 94, the concerns raised at NCSR 1 regarding the application to recognize and use the Iridium mobile satellite system in the GMDSS were responded to in document MSC 94/9/3, submitted by the United States.

2 Such concerns had been raised by the United Kingdom in document NCSR 1/12/2 and also expressed during the discussions on the issue as stated in paragraph 12.5.3 of the report of the Sub-Committee to the Committee (NCSR 1/28).

3 Additionally, Spain, based on the information provided in MSC 94/9/3, expressed additional concerns about a number of issues as stated in the annex to this document that were shared by France. Bearing in mind that these issues could not be directly related to the

assessment of compliance with the criteria set out in resolution A.1001(25), the Committee considered that they should be submitted to the NCSR Sub-Committee for further consideration.

Action requested of the Sub-Committee

4 The Sub-Committee is invited to take note of the information provided in this document and decide as it may deem appropriate.

ANNEX

In relation to document MSC 94/9/3 (Response concerning Iridium mobile satellite system application as a GMDSS service provider), submitted by the United States, France and Spain raise the following points (the comments refer to the sections of the annex to the document MSC 94/9/3):

1 With regard to the section "*IMSO Public Service Agreement (PSA) and the provision of GMDSS services*":

"The question whether Iridium would be able to commit to the five-year notice period required by the PSA, due to obligations relating to the operation of the satellites in orbit, is not relevant. The agreement between the United States Government and Iridium contains a provision indicating that if more than four satellites do not possess sufficient fuel or functionality to properly de-orbit, the United States Government may exercise the authority to direct that satellites in the constellation which have been in operation for more than seven years be removed from orbit. The United States Government receives routine reports on the health status of the satellites and the constellation. The United States Government has no plan to direct Iridium to de-orbit any functioning satellites nor to impair their ability to provide GMDSS services. The terms of this agreement only apply to the current Iridium constellation, and are not applicable to the upcoming Iridium constellation, which will begin launching in 2015. It is common for governments in space-capable nations to have similar agreements in place with satellite operators. The United States Government can attest that Iridium will be able to clearly demonstrate that it can satisfactorily fulfill the five year notice period."

France and Spain, recognizing that as the document states: "*It is common for governments in space-capable nations to have similar agreements in place with satellite operators.*", are concerned about the capacity or authority that the United States could exercise in relation to the Iridium network and how it could impact the service provided (see underlined text).

2 With regard to the section "*Additional concerns*":

"There is no requirement in resolution A.1001(25) that a GMDSS mobile satellite service provider integrate their maritime mobile terminals or network with other satellite service providers. If this is desired, the Organization must further develop requirements, protocols and interfaces that all mobile satellite service providers and equipment support so as to enable integration among systems."

France and Spain consider the guarantee of compatibility of the GMDSS providers to be absolutely necessary in order that the ships and shore stations can transmit and/or receive alerts, communication, maritime safety information, as applicable, to/from the equipment the station has, regardless the service provider of such station. If the compatibility is not guaranteed, ships and shore stations could need to install equipment from both providers to fulfil the requirements of GMDSS regulations (SOLAS Chapter IV).

In addition, if the compatibility of systems had to rely on architecture (e.g. ground cables) that is out of the oversight and assurance of the public service obligation stemming from the IMO instruments and resources, it would put in danger the reliability of the system as a whole.

3 Also with regard to the section "*Additional concerns*", at the end of third paragraph it is stated:

"...The application is clear on how this is currently supported for voice and data communications. How this functionality is supported within the network is proprietary commercial information, due to the unique nature of the network, and it is not expected that Iridium will have to support protocols or processes implemented by other service providers."

France and Spain reiterate the previous concern.

4 With regard to the section "*Incompatibility of satellite systems and equipment requirements under SOLAS Chapter IV*":

"...Many of the elements are incompatible with each other in the sense that they are incapable of direct interoperability, but by applying the procedures of the GMDSS or other arrangements they may be indirectly interoperable..."

France and Spain understand that this paragraph responds to the issues raised during the NCSR 1 and it is again absolutely in line with the incompatibility concern expressed above.

5 Finally, based on the arguments given in the section "*Additional requirements and equipment for SAR authorities and RCCs*", France and Spain consider that it should be necessary to carry out a detailed study about the issue of additional equipment for SAR and RCC's authorities.
