

Paper for Consideration by TSMAD

Proposed Changes to S-52 Presentation Library

Submitted by:	United States (NOAA)
Executive Summary:	The United States has serious reservations regarding the changes proposed for the new S-52 PresLib 3.5.
Related Documents:	S-52 PresLib, HSSC Work Plan , TSMAD25-4.11.2
Related Projects:	S-64

Introduction / Background

TSMAD25 4.11.2 provides TSMAD and DIPWG an opportunity to see the first draft of the proposed changes to be incorporated into the new S-52 Presentation Library (version 3.5). The United States has serious reservations regarding the amount of effort that will be needed to review and approve this draft by DIPWG in preparation for the approval of the PresLib3.5 by HSSC in November 2013. While S-52 is not explicitly part of the TSMAD work programme, many TSMAD members participate significantly in DIPWG activities. Preparing a new version of the S-52 Presentation Library with the magnitude of changes proposed by TSMAD25-4.11.2 will impact TSMAD's ability to update S-64 and to move S-101 forward.

Analysis/Discussion

The United States offers the following points for consideration:

1. **What are the Changes?** – Redlines (track-changes) from PresLib3.4 have not been provided. This makes it nearly impossible to accurately identify changes and to accomplish a timely review of the document.
2. **Beyond the Scope** – The scope of the changes for PresLib3.5 that were discussed at HSSC-4 related solely to incorporating existing S-52 maintenance documents and clarifying language within S-52 that may have contributed to ECDIS anomalies. The changes proposed by the UK are clearly beyond the scope of the changes discussed at HSSC. The magnitude of the changes are significant enough to warrant numbering the new version as a major revision (PresLib4.0).
3. **Non-critical Changes will Slow Adoption of New PresLib** – The large number of changes proposed, many of which are not related to the maintenance documents or to ECDIS anomalies, will require more resources to review than either DIPWG or TSMAD can afford at this time. The changes proposed in TSMAD25-4.11.2 do not describe or justify the many editorial changes that are pervasive throughout the document. The U.S. believes that many of these changes have inserted subtle changes in meaning that may not have been intended. Even if these small changes are harmless, they must still be reviewed to ensure that they are indeed benign. The “noise” introduced by these editorial and other non-critical changes, such as moving sections of the document around, only serve to make it more difficult to find and evaluate the truly important changes within the draft PresLib3.5 document in the short amount of time HSSC has given DIPWG to prepare a new version.
4. **Need to Justify Proposed Changes** – The United States agrees that S-52 issues related to ECDIS anomalies that are critical to safety should be included in the new Presentation Library, but the justification for each change needs to be clearly documented to enable DIPWG to adequately consider the impact of approving or rejecting the change. References to a particular ECDIS anomaly in the justification for a change would be helpful. The U.S. does not believe that non-specific references to “increased clarity” serve to justify the scores of textual changes, reformatting of tables and movement or extraction of large portions of the document.
5. **Follow the Established Change Process** – While there is some sense of urgency to clarify any portions of the PresLib that may have contributed to ECDIS anomalies, the HSSC action to establish a new version of the PresLib says nothing about abandoning the well-established process for reviewing and approving changes to IHO specifications as prescribed by IHO TR 2/2007. Each change that has not already been approved and incorporated into one of the two active maintenance documents must be accompanied by a discussion of the proposed change that normally consists of Background, Analysis, Conclusions, Recommendations, Justification and Impacts. DIPWG will then be able to confidently consider the changes and distinguish between those changes that merit adoption and those that do not.

6. **Lost in Translation?** – Although many would agree that the Nassi-Schniederma diagrams in S-52 are difficult to read for the uninitiated, the U.S. maintains that if the diagrams were incomprehensible they would not have been able to stand for all these years. Replacing the Nassi-Schniederma diagrams with UML may make things more clear in the long run, but the UML diagrams have not been properly vetted by DIPWG and may introduce additional errors.
7. **Lost References** – There has been no analysis of whether any of the portions of the PresLib that have been deleted or moved were referenced by IMO ECDIS Performance Standards. When PresLib3.4 was released, a matrix of affected references was created.

Recommendations

1. Provide redline (track-changes) version of S-52 PresLib3.5.
2. Reintegrate all of the tables that have been extracted into separate files back into the PresLib.
3. Remove all non-critical editorial changes and reformatting from the new version.
4. Restore the Nassi-Schniederma diagrams back into the PresLib. After a thorough review of the new UML diagrams has been accomplished, the UML can be added through a differed amendment.

Justification and Impacts

The magnitude and nature of changes proposed will adversely impact the ability of TSMAD and DIPWG to prepare a final version of the S-52 PresLib3.5 in time for approval by HSSC5 and will likely delay the update of S-64 and the completion of the portrayal portions of S-100 and S-101. All of these activities have dependencies with the PresLib and rely on many of the same people to accomplish these efforts.

Action Required of TSMAD

TSMAD is invited to:

- a. note the concerns cited by the United States,
- b. present these concerns to DIPWG for their consideration.