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Mr. Derrick J. Croinex  
Chief, Spectrum Management and Telecommunication  
U.S. Coast Guard  
2703 Martin Luther King Jr. Avenue, SE  
Washington, DC 20593

Re: Proposed Termination of U.S. Coast  
Guard Medium Frequency (MF) Broadcast  
of Navigational Telex (NAVTEX) and Shift  
to Satellite (Docket No. USCG-2019-0702)

Dear Mr. Croinex:

The American Waterways Operators is the national trade association for the tugboat, towboat and barge industry. AWO's more than 300 member companies own and operate barges and towing vessels on the U.S. inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; and the Great Lakes. Each year, our vessels safely, securely and efficiently move more than 760 million tons of cargo critical to the U.S. economy, including petroleum products, chemicals, coal, grain, steel, aggregates and containers. Tugboats also provide essential services in our nation's ports and harbors, including shipdocking, tanker escort and bunkering.

Thank you for the opportunity to comment on the Coast Guard's proposal to terminate NAVTEX broadcasts once it determines that information contained in those broadcasts is available via International Maritime Organization (IMO)-recognized satellite services. A significant number of our members operate throughout the Atlantic, Pacific and Gulf coasts where NAVTEX broadcasts are currently available, as well as noncontiguous areas in Alaska, Hawaii and Puerto Rico.

While many of our members primarily rely on satellite services for weather and navigational data, NAVTEX broadcasts remain key to the safety of America's maritime industry for several reasons.

NAVTEX broadcasts are critical to ensuring reliable transmission of maritime safety information. For smaller vessels that have not been fitted with satellite receivers, NAVTEX is often the primary means for vessels to obtain navigational warnings and meteorological forecasts. For vessels that do have satellite receivers and pay for satellite-based information systems, NAVTEX is an important redundancy measure to allow them to continue receiving navigation and weather information in the event of a satellite system failure or when operating in areas with poor satellite coverage. Our members have noted that satellite service failure is a frequent occurrence, reporting outages that have ranged from 24-72 hours over the past year.

**Whether failures are caused by benign technological disruptions or malevolent cybersecurity attacks, NAVTEX broadcasts enhance the reliability and redundancy of maritime safety information, and the maritime industry should not be forced to rely on a singular source for safety information, particularly when satellite services are not failsafe.**

Additionally, the Coast Guard's proposal does not account for current international commitments to which vessel operators may be subject. NAVTEX is an integral component of IMO's Global Maritime Distress and Safety System (GMDSS), which has been incorporated into the International Convention for the Safety of Life at Sea (SOLAS). Vessels subject to SOLAS and the U.S. Communications Act of 1934 are required to carry numerous pieces of communications equipment, including a NAVTEX receiver.

The Coast Guard's *Federal Register* notice justifies this proposal by stating that "current MF NAVTEX equipment is in dire need of replacement" and because "equipment is antiquated and essential replacement parts are difficult to find and expensive." Maintaining the equipment may represent a significant cost, but the Coast Guard's decisions about the future of NAVTEX should be driven by the safety needs of vessel operators. Moreover, since IMO is working toward a modernization of the GMDSS system that will transition from medium frequency broadcasts of NAVTEX to medium and high frequency broadcasts of NAVDAT by 2024, it would be premature for the Coast Guard to discontinue NAVTEX broadcasts on the basis that they are antiquated when a modernization of the global system is quickly approaching. Until the transition to NAVDAT broadcasts, the Coast Guard should continue to fulfill its domestic and international safety obligations by maintaining NAVTEX broadcasts and making the necessary financial outlays to keep that system operational.

Thank you again for the opportunity to comment on the proposal to terminate NAVTEX broadcasts. We would be pleased to answer any questions or provide further information as you see fit.

Sincerely,



Jennifer A. Carpenter  
Executive Vice President & COO