



Radio Technical Commission for Maritime Services

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**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

In the Matter of)	
)	
Extend Interference Protection for the Marine and Aeronautical Distress and Safety Frequency at 406.025 MHz)	MB Docket No. 03-50; FCC 03-37
)	
Notice of Proposed Rulemaking)	
)	

**COMMENTS OF THE RADIO TECHNICAL COMMISSION FOR MARITIME
SERVICES (RTCM)**

The Radio Technical Commission for Maritime Services (RTCM) respectfully submits these Comments in response to the Notice of Proposed Rulemaking (NPRM) published in the Federal Register on March 31, 2003 (68 FR 15419).

The RTCM is a non-profit organization whose objectives include studying and preparing reports on maritime telecommunications practices, needs and technologies with a view toward improving the efficiency and capabilities of maritime telecommunications services, suggesting ways to keep rules and regulations to the minimum essential for effective maritime telecommunications and making recommendations on important issues involving maritime telecommunications.

One of the stated purposes of the NPRM is to provide interference protection from cable television systems for the 406.025 MHz Emergency Position Indicating Radiobeacon (EPIRB) frequency. The proposal would prohibit the transmission of carriers or other signal components capable of delivering peak power levels equal to or greater than 10⁻⁵ watts at any point in a cable television system within 100 kHz of the 406.025 MHz. FCC regulations already provide similar protection for 121.5 MHz.

RTCM supports the purpose and intent of the NPRM and appreciates the Commission's actions to protect this important frequency. However, we believe a relatively minor revision to the proposed rules is necessary. The COSPAS-SARSAT 406 MHz frequency management plan now includes frequencies ranging from 406.025 MHz to 406.076 MHz. In addition to 406.025 MHz, 406.028 MHz is already in use, and 406.037 MHz may soon be available. **RTCM suggests that § 76.616 be revised to extend protection to 100 kHz below 406.025 MHz and 100 kHz above 406.076 MHz.**

The Commission has already taken note of the COSPAS-SARSAT frequency management plan in its revision of 47 CFR 80.1061 in its Report and Order released April 9, 2002, WT Docket no. 00-48 (see paragraphs 84 and 85). The COSPAS-SARSAT frequency management plan is available on the Worldwide Web at:
www.cospas-sarsat.org/download/T12-Nov0402withoutAnnexCandD.pdf
www.cospas-sarsat.org/download/T12-Nov0402AnnexC.pdf
www.cospas-sarsat.org/download/T12-Nov0402AnnexD.pdf

For the Radio Technical Commission for Maritime Services

A handwritten signature in black ink, appearing to read "R L Markle". The signature is written in a cursive, slightly slanted style.

R. L. Markle
President