

**Decisions on Recommendations Matrix from the First of Two Rounds of Consultation on the *Framework for the Authorisation of Maritime Mobile Services***

The following summarises the comments and recommendations received from stakeholders on the *Consultative Document on the Framework for the Authorisation of Maritime Mobile Services* (the Framework) and the decisions made by the Authority for inclusion in the document. The Authority wishes to express its thanks for all comments and recommendations received from the following stakeholder:

1. TSTT

Item	Stakeholder	Policy Section	Comments	Recommendations	TATT's Decision
1	TSTT	General	Telecommunications Services of Trinidad and Tobago Limited ("TSTT") appreciates that the Telecommunications Authority of Trinidad and Tobago ("the Authority") has given stakeholders the opportunity to comment on these matters. It should be noted that TSTT's comments on this document do not preclude TSTT from making further comments in the future.		The Authority acknowledges the appreciation expressed by Telecommunications Services of Trinidad and Tobago Limited (TSTT) for the opportunity to comment on the Framework, and its position relating to future comments.
2	TSTT	General	The Authority should explicitly state that "Maritime Mobile Services" are distinct from "Public Mobile Telecommunications Services" and not a subset thereof in the consultation document.	TSTT requests that the Authority explicitly state that "Maritime Mobile Services" are distinct from "Public Mobile Telecommunications Services" and not a subset thereof in the consultation document.	The Authority agrees, and a statement to this effect has been included in the Framework, for clarity, in the section titled Scope on Page 2 of the document.
3	TSTT	1.1 Background	<p>TSTT acknowledges the Authority's mandate to "<i>plan, supervise, regulate and manage the use of the radio frequency spectrum...</i>".</p> <p>TSTT has however noted several acts of rogue behaviour on the distress frequency where mariners:</p> <ul style="list-style-type: none"> <li>a) Utilize CH 16 for purposes other than distress matters</li> <li>b) Refuse to co-operate during a distress transmission</li> <li>c) Continue to transmit and interrupt a distress transmission</li> <li>d) Transmit or circulate false or deceptive safety or identification signals</li> <li>e) Make unnecessary transmissions</li> <li>f) Transmit profane, indecent, or obscene language</li> <li>g) Use frequencies or channels other than those stipulated in the Ship Radio License</li> </ul> <p>Despite the Authority's stated role, TSTT is unclear as to how the Authority intends to monitor and treat with the use of the distress frequencies by seafarers and address any rogue behaviour in that regard.</p>	<p>TSTT recommends that the Authority seeks to ensure that its Framework and any associated Regulations as it relates to the use of the distress frequency are aligned with the International Convention for the Safety of Life at Sea (SOLAS), 1974 identified below:</p> <p>Regulation 9.  <b>"MISUSE OF DISTRESS SIGNALS</b>  <i>The use of an international distress signal, except for the purpose of indicating that a ship or aircraft is in distress, and the use of any signal which may be confused with an international distress signal, are prohibited on every ship or aircraft."</i></p> <p>TSTT also recommends the implementation of a robust frequency use policy inclusive of the Authority's implementation of a Radio Direction Finder for the Authority to locate and penalise offenders, per Regulation 12 provided below:  <b>"DIRECTION-FINDERS</b></p>	<p>Channel 16 is recognised as the international VHF channel for maritime distress and hailing. The Authority notes the gravity of these reported acts of rogue behaviour.</p> <p>In addressing this issue, the Authority proposes to engage stakeholders, namely, TSTT, the Maritime Services Division (MSD) and the Trinidad and Tobago Coast Guard, to determine collaboratively the severity of the issue, to develop a public awareness campaign and prosecute entities that engage in persistent misuse. The awareness campaign is intended to ensure seafarers are educated on the proper distress and safety radiotelephone procedures, including the use of channel 16 and other distress channels for notifications concerning maritime distress and hailing.</p>

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				<p><i>(a) (i) The direction-finding apparatus required by Regulation 12 of Chapter V shall be efficient and capable of receiving signals with the minimum of receiver noise and of taking bearings from which the true bearing and direction may be determined.</i></p> <p><i>(ii) It shall be capable of receiving signals on the radiotelegraph frequencies assigned by the Radio Regulations for the purposes of distress and direction-finding and for maritime radio."</i></p>	<p>The public will be apprised of the penalties associated with:</p> <ol style="list-style-type: none"> <li>1. the transmission of false or deceptive distress, safety or identification signals.</li> <li>2. any actions which prejudice the efficiency of any life-safety service or endanger the safety of any person, ship or vessel.</li> </ol> <p>The Authority has added section 3 on Maritime Distress Signals to the Framework accordingly.</p>
4	TSTT	1.5 Relevant Legislation	The Authority has incorrectly cited the reference to the relevant legislation.	<p><i>The Authority to correct the reference to the relevant legislation as follows:</i></p> <p><i>“(i) plan, supervise, regulate and manage the use of the radio frequency spectrum, including—</i></p> <p style="padding-left: 40px;"><i>(i) the licensing and registration of radio frequencies and call signs to be used by all stations operating in Trinidad and Tobago or on any ship, aircraft, or other vessel or satellite registered in Trinidad and Tobago;</i></p> <p style="padding-left: 40px;"><i>(ii) the allocation, assignment and reallocation or reassignment of frequency bands where necessary;”</i></p>	The reference in the Framework on page 2 under section 1.5 (Relevant Legislation) has been corrected.
5	TSTT	2.10 Formation of Call Signs	9YA is listed as a Coast Station under the column Class of Coast Station.	North Post Maritime Radio is the only English-speaking coast radio station in the Caribbean. 9YA is the call sign of the TTCG and is not a coast station therefore, it should not be recognised as a coast radio station; TTCG is Trinidad and Tobago's Maritime Rescue Coordination Center (SAR). The TTCG stations around the twin island state should be recognised as sub-MRCC stations which were traditionally called land-based stations.	The intention was not to list the assignments but the formations. Under this Framework, coast stations have been defined as land stations. The permitted formation for coast stations was modified to a range (9YA, 9YK - 9YQ) under section 2.10 <i>Formation of Call Signs</i> on Page 16. 9YA is assigned to Staubles Bay Chaguaramas coast station.