

**REPUBLIC OF
THE MARSHALL ISLANDS**



Long-Range Identification and Tracking (LRIT) of Ships

MARITIME ADMINISTRATOR

TABLE OF CONTENTS

TABLE OF CONTENTS	2
PURPOSE	5
APPLICABILITY	5
REQUIREMENTS	6
1.0 Compliance Dates	6
1.1 Ships Constructed on or after 31 December 2008	6
1.2 Ships operating in sea area A1	6
2.0 Sea Areas of Operation	6
3.0 Definition of “Constructed”	7
4.0 Terminal LRIT Conformance Testing	7
5.0 Authorized LRIT Conformance Test Application Service Providers (ASPs) ..	8
6.0 LRIT Conformance Test	9
6.1 Test Results.....	9
6.2 Test Report.....	9
7.0 Ship Safety Radio Survey and Safety Certification	10
7.1 Safety Radio Survey	10
7.2 First Survey of the Radio Installation	10
7.3 Ship Safety Radio Surveys.....	10
7.4 SOLAS Safety Equipment Certification	11
7.5 Record of Equipment	11
7.6 Difficulties in Conducting Conformance Testing.....	11
7.7 Offshore, Special Units, Small Cargo Ships, Fishing Vessels, and Yachts	13
7.8 Availability of LRIT CTRs at First Survey	13
8.0 Exceptions, IMO Circular MSC.1/Circ.1295	14
8.1 FPSOs and FSUs.....	14
8.2 OSVs.....	14
8.3 SPSs	15
8.4 IMO Assembly Resolution A.494(XII) Ships	15
8.5 Commercial Fishing Vessels.....	15
8.6 Yachts	15

8.7	Contracting Government Jurisdictions	16
9.0	Exemptions and Equivalentents.....	17
9.1	General	17
9.2	Specific Cases	18
10.0	Administrator Authorized Operational Procedures.....	18
GENERAL OVERVIEW		19
11.0	Architecture.....	19
12.0	Administrator Responsibilities	20
12.1	National LRIT Data Centre.....	20
12.2	RMI NDC Requirements	20
12.3	Transmission Charges	21
12.4	LRIT Coordinator Oversight.....	21
13.0	National Vessel Monitoring System	22
14.0	RMI NDC Administrator/ASP Obligations.....	22
15.0	Type Approved Shipborne Terminal	23
16.0	Shipborne Terminal Requirements.....	24
17.0	Ship Security Alert Systems.....	25
18.0	Duplication of Equipment	25
19.0	Shipowner Obligations	26
20.0	Transfer of Flag.....	27
20.1	Compliance	27
20.2	LRIT CTR Validity	27
20.3	Registration Procedures	27
20.4	De-commissioning/Re-commissioning Satellite Provider Services	28
21.0	Inquiries.....	28
APPENDIX A: LRIT COMPLIANCE AND ENFORCEMENT DECISION MATRIX		29
APPENDIX B: LRIT COMPLIANCE FLOWCHART		30



**REPUBLIC OF
THE MARSHALL ISLANDS**

MARITIME ADMINISTRATOR

Marine Notice

No. 2-011-25

Rev. Dec/2023

**TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF
MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS**

SUBJECT: Long-Range Identification and Tracking (LRIT) of Ships

- References:**
- (a) **SOLAS**, *International Convention for the Safety of Life at Sea, Consolidated Edition 2020*
 - (b) **IMO Assembly Resolution [A.694\(17\)](#)**, *General requirements for shipborne radio equipment forming part of the global maritime distress and safety system (gmdss) and for electronic navigational aids*, adopted 6 November 1991
 - (c) **IMO Assembly Resolution [A.813\(19\)](#)**, *General requirements for electromagnetic compatibility of all electrical and electronic ship's equipment*, adopted 23 November 1995
 - (d) **IMO Resolution [MSC.263\(84\)](#)**, *Revised performance standards and functional requirements for the long-range identification and tracking of ships*, adopted 16 May 2008, as amended by **IMO Resolutions [MSC.330\(90\)](#)**, adopted 25 May 2012, and **[MSC.400\(95\)](#)**, adopted 8 June 2015
 - (e) **IMO Circular [MSC.1/Circ.1290](#)**, as amended, *Unified interpretation of the term "First Survey"*, issued 16 December 2008
 - (f) **IMO Circular [MSC.1/Circ.1295](#)**, *Guidance in relation to certain types of ships which are required to transmit LRIT information on exemptions and equivalents and on certain operational matters*, issued 8 December 2008
 - (g) **IMO Circular [MSC.1/Circ.1298](#)**, *Guidance on the Implementation of the LRIT System*, issued 8 December 2008
 - (h) **IMO Circular [MSC.1/Circ. 1307](#)**, *Guidance on the survey and certification of compliance of ships with the requirement to transmit lrit information*, issued 9 June 2009
 - (i) **IMO Circular [GMDSS.1/Circ.17](#)**, *Master plan of shore-based facilities for the global maritime distress and safety system (GMDSS master plan)*, issued 4 March 2015
 - (j) **RMI Maritime Regulations, [MI-108](#)**
 - (k) **RMI Marine Notice [2-011-16](#)**, *International Ship and Port Facility Security (ISPS) Code*
 - (l) **RMI Marine Notice [2-011-18](#)**, *Ship Security Alert System (SSAS)*
 - (m) **RMI Marine Notice [2-011-26](#)**, *Application for Service Extensions/Dispensations*

PURPOSE

This Notice provides clarification on the requirements for Long-Range Identification and Tracking (LRIT) with which Republic of the Marshall Islands (RMI)-flagged ships must comply.

This Notice supersedes Rev. Jun/2022. The address for Transas in §5.1.3 has been updated.

APPLICABILITY

International Convention for the Safety of Life at Sea (SOLAS) V/19-1 establishes the requirement for ships to transmit LRIT information. It also establishes the rights and obligations of Contracting Governments and of Search and Rescue services to receive that LRIT information.

SOLAS V/19-1 applies to the following types of RMI-flagged ships engaged on international voyages:

- a. all passenger ships, including high-speed passenger craft, of any gross tonnage (GT);
- b. cargo ships, including high-speed craft, of 300 GT¹ and above;
- c. self-propelled mobile offshore drilling units, not on location; and
- d. in accordance with SOLAS Ch. V/1.4:
 1. Commercial Yachts of 300 GT and above;
 2. Yachts Engaged in Trade (YETs):
 - (i) 300 GT and above certified to carry up to 12 passengers;
 - (ii) Regardless of GT certified to carry more than 12 passengers;
 3. Private Yachts Limited Charter (PYLCs) of 300 GT and above, assigned category 0 (unrestricted service) and category 1 (150 nautical miles);
 4. Passenger Yachts (PAXYs), of any GT; and
 5. commercial fishing vessels, of any GT, irrespective of area of operation.

¹ The GT to be used for determining whether a cargo ship or high-speed craft is required to comply with the provisions of SOLAS V/19-1 is to be that determined under the provisions of the International Convention on Tonnage Measurement of Ships, 1969 (ITC '69), regardless of the date on which the ship or high-speed craft has been or is being constructed.

Note that a rigidly-connected composite unit of a pushing vessel and associated pushed vessel, when designed as a dedicated and integrated tug and barge (ITB) combination, will be regarded as a single ship for this regulation.

See §9.0 below for Exceptions (International Maritime Organization (IMO) Circular [MSC.1/Circ.1295](#)).

REQUIREMENTS

1.0 Compliance Dates

RMI-flagged ships must comply with the LRIT regulations and be fitted with a terminal that is to transmit automatically the information specified in §11.4 below.

1.1 Ships Constructed on or after 31 December 2008

SOLAS V/19-1 and IMO Circular [MSC.1/Circ.1307](#) require ships constructed on or after 31 December 2008, to comply with LRIT when the ship is placed in service. See §3.0 for the definition of “constructed”.

1.2 Ships operating in sea area A1

Regardless of the construction date, ships fitted with an automatic identification system (AIS), as defined in SOLAS V/19.2.4, and operated exclusively within sea area A1, as defined in SOLAS IV/2.1.12, **are not** required to comply with the provisions of SOLAS V/19-1 (LRIT requirements).

An exemption certification from the requirement to comply with SOLAS V/19-1 **is not** required. For shipowners concerned with port State control (PSC), the RMI Maritime Administrator (the “Administrator”) will consider, upon request, **authorizing the issuance of an** exemption certificate describing the ship’s operating area.

2.0 Sea Areas of Operation²

- 2.1 All ships operating in sea area A3 require compliant shipborne equipment (the “terminal”).
- 2.2 Ships operating in near-coastal sea area A2 not fitted with Inmarsat C Global Maritime Distress and Safety System (GMDSS) are required to fit a compliant terminal.
- 2.3 Ships operating in polar sea area A4 above 76 degrees North and South latitudes require a non-Inmarsat terminal that operates in conjunction with a low-earth orbit Communication Service Provider (CSP) system approved by the Administrator in conjunction with its appointed Application Service Provider (ASP). The Iridium system is acceptable. See §5.0 for a list of authorized ASPs.

² Refer to the [GMDSS Master Plan Annexes 2, 3, and 4](#) for detailed descriptions of sea areas.

3.0 Definition of “Constructed”

3.1 The Administrator uses the definition of **constructed** as found in SOLAS V/2, *Definitions*, which with respect to a ship means:

3.1.1 A stage of construction where:

- a. the keel is laid;
- b. construction identifiable with a specific ship begins; or
- c. assembly of the ship has commenced comprising at least 50 tonnes or 1% of the estimated mass of all structural material, whichever is less.

3.2 New builds being delivered on or after 31 December 2008 are subject to compliance as ships constructed before 31 December 2008, unless the above definition of **constructed** actually applies on or after 31 December 2008.

4.0 Terminal LRIT Conformance Testing

4.1 LRIT conformance testing of shipborne terminals is mandatory, in accordance with IMO Circular [MSC.1/Circ.1307](#).

Refer to §15.0 through §17.0 of this Marine Notice for information on terminal technical compliance requirements.

4.2 For ships constructed before 31 December 2008, the shipborne terminal LRIT conformance test must be:

- 4.2.1 conducted as soon as possible, but at least three months before the date on which a ship would need to demonstrate compliance with the requirements of SOLAS V/19-1; and
- 4.2.2 satisfactorily completed before the Record of Equipment being endorsed to document compliance with the requirements relating to the LRIT system.

4.3 For ships constructed on or after 31 December 2008, the shipborne terminal conformance test must be:

- 4.3.1 conducted after completing the initial survey of the radio installation in accordance with the provisions of SOLAS I/7(a)(i) or I/9(a)(i), provided such survey has indicated that, as far as the radio installation is concerned, the ship meets the related requirements for the issue of a Passenger Ship Safety Certificate, a Cargo Ship Safety Equipment Certificate, or a Cargo Ship Safety Certificate; and
- 4.3.2 satisfactorily completed before issuing a Passenger Ship Safety Certificate, a Cargo Ship Safety Equipment Certificate, or a Cargo Ship Safety Certificate, as required, endorsed to document compliance with the requirements relating to the LRIT system.

5.0 Authorized LRIT Conformance Test Application Service Providers (ASPs)

5.1 Pursuant to the provisions of paragraph 6.1 through 6.3 of IMO Circular MSC.1/Circ.1307, as amended, regarding guidance on the survey and certification of compliance of ships with the requirement to transmit LRIT information, the following companies (each based in the United Kingdom (UK) and leading providers of satellite tracking services) have been appointed to act on behalf of the Administrator as authorized testing ASPs:

5.1.1 Pole Star Space Applications
3rd Floor, The Studio Building, 21 Evesham St.,
London, W11 4AJ, UK
Tel:+44 (0)20 7313 7403
Website: <http://lrit.com>
LRIT Testing: lrittesting@polestarglobal.com
LRIT Certification: lritcert@polestarglobal.com

5.1.2 Fulcrum Maritime Systems Ltd. (Fulcrum)
Unit 3 Park Mews, 15 Park Lane,
Hornchurch, Essex RM11 1BB, UK
Tel:+44 (0)17 0878 8400
Fax:+44 (0)17 0878 8402
Website: <http://www.fulcrum-maritime.com>
Email: lrit.admin@fulcrum-maritime.com

5.1.3 Transas Marine International
Livewire Connections Ltd t/a Telemar Yachting
Unit 41, Barwell Business Park, Leatherhead Road
Chessington Surrey KT9 2NY, UK
Tel: +44 (0)20 8974 0900
Website: www.transas.com
LRIT General Enquiries and Customer
Support: lritsales.uk@telemargroup.com

5.2 Pole Star, Fulcrum, and Transas have certified and the Administrator has determined that their LRIT Conformance Test Services fully comply with the shipborne terminal testing requirements, procedures, and tolerances detailed in IMO Circular [MSC.1/Circ.1307](#) (Appendix 1) and that they have in place the infrastructure to manage the anticipated demand including the ASP IT infrastructure, customer and technical support services necessary. Thus, they have been given full authority to undertake shipborne terminal testing and subsequent issuance of LRIT CTRs.

5.3 To discuss LRIT terminal requirements further and to ensure shipborne terminals are LRIT compliant, shipowners or operators are advised to contact one of the ASPs in §5.1.1-5.1.3

- 5.4 If the conformance testing has determined that the nominated terminal(s) is or are non-compliant, the testing ASPs are prepared, at the shipowner's request, to provide a quotation for a compliant terminal and make arrangements for the necessary delivery, installation, and activation via their global network of agents.

6.0 LRIT Conformance Test

6.1 Test Results

- 6.1.1 The LRIT conformance test has been designed to demonstrate compliance of the shipborne terminal with the functional requirements of SOLAS V/19-1.5 and of section 4 of the Performance Standards. The terminal compliance testing program lasts from 30 to 48 hours from operational activation.
- 6.1.2 On satisfactory completion of a shipborne terminal conformance test, the ASP conducting the test is to issue the LRIT conformance test results to the shipowner/operator. On the basis of successful test results, the shipowner/operator must then immediately request from the test ASP the issuance of the required LRIT CTR in the format conforming to the model set out in RMI Form [RADMI-05](#). This may take seven (7) to 14 days which must be taken into consideration when preparing for the first survey of the vessel.

6.2 Test Report

- 6.2.1 As described above, the LRIT conformance testing concludes with the issuance of a formal LRIT CTR to the shipowner by the test ASP. The original LRIT CTR must be placed on board with copies provided to the ship's Designated Person Ashore (DPA) and the Administrator for record keeping and database entry.
- 6.2.2 The LRIT CTR must remain with the ship's documents for as long as the shipborne terminal is deemed compliant because it does not expire until there may be reason to require the LRIT conformance test to be repeated and the LRIT CTR reissued. Such an occasion may be the result of, but may not be limited to, terminal upgrading or replacing; transfer of a terminal from one ship to another; changes in ship ownership, ship management, flag of registry, Data Center, and/or ASP.
- 6.2.3 The CTR is the "Conformance Test **Report**" and should not be mistaken for the conformance test **results**. Recognized Organizations (ROs) are not to issue a full-term Safety Equipment Certificate on the basis of the conformance test **results**. Owners, operators, and ROs may refer to Appendix 2 of this Notice for new vessels registering into the RMI and for vessels transferring into the RMI flag. For any further clarification on CTRs or any question on the LRIT contact the Radio Service Area directly at radio@register-iri.com.
- 6.2.4 LRIT CTRs issued by Pole Star before 01 June 2017, are marked "N/A" in the field for "Distinctive numbers or letters" rather than the ship's call sign. The Administrator is aware of this and acknowledges that the ship can still be identified by the IMO and the Maritime Mobile Service Identity (MMSI) numbers, both listed on the CTR. With effect from 01 June 2017, all CTRs issued by Pole Star have replaced "NA" with the ship's Call Sign in the "Distinctive numbers or letters" field.

6.2.5 CTRs issued by Pole Star can be verified using the following link:

<https://polestar.secure.force.com/LRITrequest/ConformanceTestReports>

Verification will require entry of the IMO and CTR numbers.

7.0 Ship Safety Radio Survey and Safety Certification

7.1 Safety Radio Survey

The Safety Radio Survey is only being used as a triggering mechanism for LRIT compliance and does not affect or limit the issue or endorsement of full term safety radio certification by the RO, provided the ship radio installation is in all other respects deemed to be in compliance with the requirements of SOLAS Chapter IV for the vessel.

7.2 First Survey of the Radio Installation

7.2.1 IMO Circular [MSC.1/Circ.1290](#) provides that when the term “first survey” is referenced by a regulation in SOLAS, as amended, it means the first “regularly scheduled” annual, periodical, or renewal survey, whichever is due first after the date specified in the relevant regulation, or any other survey if the Administrator deems it to be reasonable and practicable.

7.2.2 For ships constructed on or after 31 December 2008, the *initial* Safety Radio Survey is to be considered the first survey and such ships are to comply with the requirement to transmit LRIT information before they are put into service.

7.2.3 A change of flag or other occasional Safety Radio Survey which may be called for is not to be considered the first survey of the radio installation. Thus, LRIT compliance would only apply at these surveys if they fall within the range of a regularly scheduled annual, periodical, or renewal survey and credit for the regularly scheduled survey is sought by the shipowner/ operator.

7.3 Ship Safety Radio Surveys

7.3.1 Ship Safety Radio Surveys will include a terminal compliance check before initial issue, endorsement, or renewal of the relevant Safety Radio Certificate and amendment of the associated Safety Certificate Record of Equipment.

7.3.2 Prior to the issue, endorsement, or renewal of a Passenger Ship Safety Certificate, a Cargo Ship Safety Equipment Certificate, or a Cargo Ship Safety Certificate following an initial, annual, periodical, or renewal survey, as the case may be, or the amendment of the associated **Record of Equipment**, the Administrator or RO acting on behalf of the Administrator is to:

.1 examine the LRIT CTR and ascertain whether it is valid;

- .2 obtain information confirming that the shipborne terminal is transmitting LRIT information to the ASP and that the LRIT information transmitted by the ship will be provided through the ASP to the RMI National Data Centre (NDC);
- .3 verify compliance of the ship with any requirements of SOLAS V/19-1 and of section 4 of the Performance Standards which are not reported as having been examined during the LRIT conformance test;
- .4 consider any shipborne terminal which forms part of a radio installation which is already certified or is to be certified as meeting the requirements of SOLAS Chapter IV and qualifying for the issue or endorsement of a Passenger Ship Safety Certificate, a Cargo Ship Safety Equipment Certificate, or a Cargo Ship Safety Certificate following an initial, annual, periodical, or renewal survey, as the case may be, as meeting requirements of section 4 of the Performance Standards as far as the salient aspects of IMO Assembly Resolutions [A.694\(17\)](#) and [A.813\(19\)](#); and
- .5 find out whether the Passenger Ship Safety Certificate, a Cargo Ship Safety Equipment Certificate, or a Cargo Ship Safety Certificate is valid or that the survey of the radio installation has been satisfactorily completed and the related certificate will be issued, endorsed, or renewed, as the case may be.

7.4 SOLAS Safety Equipment Certification

SOLAS Safety Equipment Certification has been amended by IMO Resolution [MSC.216\(82\)](#) which sets out in its Annex 1 the insertion in the Record of Equipment an entry to indicate compliance with LRIT systems and to provide for the endorsement for LRIT compliance in accordance with SOLAS V/19-1.

7.5 Record of Equipment

- 7.5.1 The Record of Equipment means the Passenger Ship Safety Certificate (Form P), the Record of Equipment for the Cargo Ship Safety Equipment Certificate (section 3 of Form E), the Record of Equipment for the Cargo Ship Safety Certificate (section 5 of Form C), and the Record of Equipment for High-Speed Craft Safety Certificate issued under the provisions of the International Code of Safety for High-Speed Craft or the International Code of Safety for High-Speed Craft, 2000.
- 7.5.2 As a result, any amendment of the Cargo Ship Safety Radio Certificate or of the Record of Equipment for the Cargo Ship Safety Radio Certificate (Form R), or any amendment of the Cargo Ship Safety Certificate (Form C), or of the Record of Equipment for the Cargo Ship Safety Certificate (section 5 of Form C), other than the one specified in §7.4 above in relation to LRIT systems, will not be accepted as attesting to the compliance of the ship concerned with the requirement to transmit LRIT information.

7.6 Difficulties in Conducting Conformance Testing

- 7.6.1 Those who have engaged in conformance testing have advised that they have encountered difficulties when attempting to conduct conformance testing in certain parts of the world

or in certain situations, for example, when a ship is in a shipyard during construction or undergoing repairs or modifications. Legitimate circumstances have also precluded the timely delivery, installation, and testing of shipborne equipment intended to be used to comply with the requirement to provide LRIT information prior to the occasion of the first survey.

- 7.6.2 ROs are advised that in such circumstances the inability to complete the conformance testing and delivery of an LRIT CTR in time for the first survey should not be considered as making the ship unseaworthy or as a reason for delaying the ship in port until the conformance testing is satisfactorily completed and the CTR is delivered, provided suitable arrangements are made to the satisfaction of the Administrator as soon as is practically possible.
- 7.6.3 If the LRIT conformance testing has not been completed and/or the LRIT CTR delivered on board by the time of the first survey of the radio installation after 31 December 2008, the Administrator will authorize the RO, under the normal request procedures provided in RMI Marine Notice [2-011-26](#), to issue a 30-day Short Term Safety Equipment Certificate to the ship to allow time for the shipborne terminal LRIT conformance testing to be completed and/or the CTR to be delivered under the following conditions:
- .1 when the shipmanager or operator produces objective evidence to the RO that efforts have already started to arrange shipborne terminal LRIT conformance testing;
 - .2 when the shipmanager or operator produces objective evidence of successful shipborne terminal LRIT conformance testing and application for the issuance of the LRIT CTR;
 - .3 when found necessary under newbuilding delivery circumstances; or
 - .4 when a ship is in shipyard undergoing repairs or modifications when the first survey becomes due.
- 7.6.4 This authorization is being provided to accommodate initial installations of terminals, upgrades or new acquisitions when found necessary and to preclude any problems with the ship clearing out of port and clearing in or out at its next port or ports during this 30-day period.
- 7.6.5 The provisions of SOLAS I/14(d) and I/14(e) are to apply as follows:
- .1 If the ship, at the time when the relevant Short Term Safety Certificate expires, is not in a port in which it is to be surveyed, the Administrator may consider extending the certificate, but such extension is to be granted only for the purpose of allowing the ship to complete its voyage to the port in which it is to be surveyed, and then only in cases where it appears proper and reasonable to do so.
 - .2 A ship to which an extension is granted is not to be, on its arrival in the port in which it is to be surveyed, entitled by virtue of such extension to leave that port without having obtained the relevant Full Term Safety Certificate endorsed to indicate LRIT compliance or accompanied by an LRIT CTR, whichever applies.

7.7 Offshore, Special Units, Small Cargo Ships, Fishing Vessels, and Yachts

7.7.1 As the Mobile Offshore Drilling Unit (MODU) Safety Certificate and the MODU Safety Certificate, 1989, are not accompanied by a Record of Equipment, such self-propelled mobile offshore drilling units when not on location will be considered as meeting the requirements when:

- .1 the provisions of §16.0 and §18.0 below are met;
- .2 there is a valid certificate on board issued under the RMI MODU Code in the case of units constructed prior to 31 December 1981, or a valid MODU Safety Certificate, 1979, or a valid MODU Safety Certificate, 1989; and
- .3 there is a valid LRIT CTR on board issued in accordance with the provisions of IMO Circular [MSC.1/Circ.1307](#).

7.7.2 In cases where the Record of Equipment associated with the safety certificates issued to floating production storage and offloading units (FPSOs), floating storage units (FSUs), offshore supply vessels (OSVs), special purpose ships (SPSs) or [A.494\(XII\)](#)-ships (see §8.4 for definition), fishing vessels, or yachts does not include a provision for documenting compliance with the requirement to transmit LRIT information, these ship types are to carry on board a valid LRIT CTR issued in accordance with the provisions of IMO Circular [MSC.1/Circ.1307](#).

7.7.3 Cargo ships with a GT that is 300 and above but of less than 500 are not required to hold a valid Cargo Ship Safety Equipment Certificate and thus there is no associated Record of Equipment which could be endorsed so as to attest their compliance with the requirement to transmit LRIT information. The compliance of these cargo ships with the requirement to transmit LRIT information should therefore be documented:

- .1 in case they are issued with a Cargo Ship Safety Certificate, by completing the relevant entry in section 5 of the Record of Equipment; or
- .2 by a valid LRIT CTR issued in accordance with IMO Circular [MSC.1/Circ.1307](#).

7.8 Availability of LRIT CTRs at First Survey

7.8.1 The standard is very clear that the LRIT CTR must be on board on the occasion of the first survey before the Record of Equipment can be endorsed for LRIT compliance.

7.8.2 A shipowner intending to install a dedicated terminal on board for LRIT purposes needs to do so well enough in advance of the ship's first Safety Radio Survey to avoid the circumstance where the LRIT CTR has not yet been delivered to the ship in time for the first survey.

7.8.3 If, after successful testing of the shipborne terminal, the LRIT CTR has not yet been delivered to the ship in time for the first survey, ROs are advised that in such circumstances the inability to produce an LRIT CTR should not be considered as making the ship

unseaworthy or as a reason for delaying the ship in port until the CTR is delivered, provided again that suitable arrangements are made to the satisfaction of the Administrator as soon as is practically possible.

- 7.8.4 In any such instance, the RO is authorized to accept an emailed PDF copy of the original LRIT CTR issued by the Administrator's appointed Test ASPs during the survey or within the 30-day limits of a Short Term Safety Equipment Certificate after the survey to complete the Safety Equipment survey in a timely manner with the understanding that at the earliest possible opportunity, the ship manager is to effect delivery of the original LRIT CTR to the ship.
- 7.8.5 During any subsequent annual, periodical, renewal, or change of flag survey following the initial certification of compliance of a ship with the requirements of SOLAS V/19-1, the related safety certificate is to be endorsed or issued, as the case may be, provided the LRIT CTR is still valid in accordance with the requirements stated in IMO Circular MSC.1/Circ.1307, paragraphs 7.2 and 7.3 and considering the provisions of §21.0 below on Transfer of Flag.
- 7.8.6 The Administrator will critically address each situation on a case-by-case basis, taking into consideration the circumstances that may prevail at that time, subject to the LRIT CTR validity requirements stated in IMO Circular [MSC.1/Circ.1307](#).

8.0 Exceptions, IMO Circular [MSC.1/Circ.1295](#)

8.1 FPSOs and FSUs

- 8.1.1 FPSOs and FSUs *not propelled by mechanical means* are *not required* to transmit LRIT information when on location or in transit under tow on an international voyage.
- 8.1.2 FPSOs and FSUs propelled by mechanical means of 300 GT and above fitted with AIS and operating exclusively within sea area A1, are *not required* to transmit LRIT information when in transit and engaged on international voyages.
- 8.1.3 FPSOs and FSUs propelled by mechanical means are required to transmit LRIT information in accordance with the provisions of SOLAS V/19-1, if not excepted otherwise under IMO Circular [MSC.1/Circ.1295](#).

8.2 OSVs

- 8.2.1 OSV means a vessel which is primarily engaged in the transport of stores, materials and equipment to offshore installations and which is designed with accommodation and bridge erections in the forward part of the vessel and an exposed cargo deck in the after part for the handling of cargo at sea in accordance with the *Guidelines for the design and construction of offshore supply vessels, 2006*, adopted by IMO Resolution [MSC.235\(82\)](#).
- 8.2.2 OSVs of 300 GT and above when engaged on international voyages fitted with AIS and operating exclusively within sea area A1 are not required to transmit LRIT information.

8.2.3 OSVs constructed before 31 December 2008, in case they are not required to comply with the provisions of SOLAS Chapter IV, are required to transmit LRIT information in accordance with the provisions of SOLAS V/19-1 as from 31 December 2009, if not excepted otherwise under IMO Circular MSC.1/Circ.1295.

8.3 SPSs

8.3.1 SPS means a mechanically self-propelled ship which by reason of its function carries on board more than 12 special personnel as defined in paragraph 1.3.11 of the Code of Safety for Special Purpose Ships, 2008.

8.3.2 SPSs of 300 GT and above when engaged on international voyages fitted with AIS and operating exclusively within sea area A1, are not required to transmit LRIT information.

8.3.3 SPSs of GT 300 and above but less than 500, in case they are not required to comply with the provisions of SOLAS Chapter IV, are required to transmit LRIT information in accordance with the provisions of SOLAS V/19-1 as from 31 December 2009, if not excepted otherwise under IMO Circular MSC.1/Circ.1295.

8.4 IMO Assembly Resolution [A.494\(XII\)](#) Ships

8.4.1 An A.494(XII) ship means a ship the keel of which was laid before 18 July 1994 and which in accordance with the provisions of operative paragraph 3 of IMO Assembly Resolution A.494(XII), “revised interim scheme for tonnage measurement for certain ships,” was allowed to use the GT determined in accordance with national tonnage rules in determining whether it is required to comply with the provisions of SOLAS Chapter IV.

8.4.2 A.494(XII) ships, when engaged on international voyages fitted with AIS and operating exclusively within sea area A1, are not be required to transmit LRIT information.

8.4.3 A.494(XII) ships of 300 GT and above but less than 500, in case they are not required to comply with the provisions of SOLAS Chapter IV, are required to transmit LRIT information in accordance with the provisions of SOLAS V/19-1, if not excepted otherwise under IMO Circular [MSC.1/Circ.1295](#).

8.5 Commercial Fishing Vessels

8.5.1 Commercial fishing vessel means a decked vessel for the time being used or intended to be used commercially for catching fish or other living resources of the sea that is registered under Chapter 2, Part I, of the RMI Maritime Act, 1990 ([MI-107](#)), and is described in the register and on the Certificate of Registry as a commercial fishing vessel.

8.5.2 Commercial fishing vessels of any GT irrespective of the area of operation are required to transmit LRIT information.

8.6 Yachts

8.6.1 Commercial Yachts, PYLCs, and YETs certified to carry up to 12 passengers

Where the LRIT transmitting requirements apply, these vessels when engaged on international voyages, are not required to transmit LRIT information, if fitted with AIS and operating exclusively within Sea Area A1.

When constructed before 31 December 2008 and not required to comply with SOLAS Chapter IV, these vessels must transmit LRIT information in accordance with SOLAS V/19-1, unless exempt under IMO Circular MSC.1/Circ.1295.

8.6.2 PYLC-Category 2 and Private Yachts

These vessels are not required to carry LRIT, but may do so voluntarily, provided that the LRIT equipment:

- .1 meets SOLAS V/19-1.6 and V19-1.7;
- .2 meets the performance standards and function requirements contained in IMO Resolution MSC.263(84); and
- .3 has a valid Conformance Test Report (CTR) issued by an Administrator authorized Service Provider.

When LRIT is carried, either as required or on a voluntary basis, the yacht must comply with all applicable requirements of this Notice.

8.6.3 PAXYs and YETs certified to carry more than 12 passengers

PAXYs are not required to transmit LRIT information when engaged on international voyages, fitted with AIS, and operating exclusively within Sea Area A1.

However, they are required to transmit LRIT information per SOLAS V/19-1, if not exempt under IMO Circular [MSC.1/Circ.1295](#).

8.6.4 Lay-up

When a yacht has entered seasonal lay-up, long-term shipyard periods, or similar long term lay-up periods, the yacht's radio station, including the LRIT terminal, may be powered down. See §10.3 on the duty to communicate with the local authority.

When it is necessary for the unit to be switched off, the procedures in §10 are to be strictly followed. The Radio Service Area must be notified by email sent to radio@register-iri.com.

8.7 Contracting Government Jurisdictions

FPSOs and FSUs, whether propelled by mechanical means or not, OSVs, SPSs, [A.494\(XII\)](#) ships, commercial fishing vessels, PAXYs, and commercial yachts operating within areas under the jurisdiction of a Contracting Government or of a State which is not a Contracting Government must transmit LRIT information if the Contracting Government or the State in whose jurisdiction they operate requires such transmission.

9.0 Exemptions and Equivalentents

The provisions of this section and the following §9.1 and §9.2 apply to ships and to FPSOs, FSUs, OSVs, SPSs, A.494(XII) ships, and yachts which are required to transmit LRIT information and any reference to a ship below should be considered as including all the aforesaid.

9.1 General

- 9.1.1 Although the provisions of SOLAS V/19-1 do not include any express provisions that allow or enable the Administrator to grant exemptions from, or equivalentents to, the requirement to transmit LRIT information, when such exemptions or equivalentents are warranted, the Administrator may consider invoking, in lieu, the provisions of SOLAS V/3.2 when considering or granting any exemptions or equivalentents to the provisions of SOLAS V/19-1.
- 9.1.2 The Administrator may consider granting to individual ships, exemptions or equivalentents of a partial or conditional nature, when full application of SOLAS Chapter V is unreasonable or unnecessary, taking into account, any such ship is engaged on a voyage where the maximum distance offshore, the length and nature of its voyage, the absence of general navigational hazards, and other conditions affecting safety, are such as to render [minimal?] the effect such exemptions and equivalentents may have upon the safety of all other ships.
- 9.1.3 In such cases, the Administrator will adhere to the provisions of SOLAS V/3.3 which requires the submission to the IMO a report summarizing all new exemptions and equivalentents granted under SOLAS V/3.2 giving the reasons for granting such exemptions and equivalentents.
- 9.1.4 The Administrator, when invoking the provisions of SOLAS V/3.2, is to be taking, in addition to what is expressly stipulated in the aforesaid regulation, the effect such exemptions or equivalentents may have on measures established by the IMO with a view to enhancing maritime security and is to be consulting with the Contracting Government(s) within whose jurisdiction the port(s) or place(s) to which the ship is proceeding to is/are located and with the Contracting Government(s) of the coast of which the ship might be navigating.
- 9.1.5 Notwithstanding any additional conditions which the Administrator may stipulate when granting exemptions or equivalentents from the requirement to transmit LRIT information, the ship concerned is to be required, in lieu of transmitting LRIT information, to either:
- .1 provide a copy of the voyage or passage plan³ for the specific voyage to the Contracting Government within whose jurisdiction the port or place to which the ship is proceeding is located and to the Contracting Governments of the coast(s) of which the ship might be navigating and any changes thereto; or

³ Refer to IMO Assembly Resolution [A.893\(21\)](#) on guidelines for voyage planning.

- .2 report its positions at regular intervals, to be determined by the Administrator taking into account the specific voyage or passage plan, to the aforesaid Contracting Governments, if provided with the means for doing so.

9.2 Specific Cases

- 9.2.1 Ships which are not normally engaged on international voyages but which, in exceptional circumstances, are required to undertake a single international voyage may be exempted from the requirement to transmit LRIT information, pursuant to the provisions of SOLAS I/4(a), exemptions from the requirements of SOLAS IV/7 to IV/11 (Radio Equipment Requirements General and for sea areas A1, A2, A3, A4, and combinations thereof) for a single voyage. Such circumstances should be rare for vessels registered in the RMI.
- 9.2.2 Ships fitted with AIS and operating exclusively within sea area A1, may, for the purpose of employment in another sea area, undertake a single voyage outside sea area A1 during the course of which it may be exempted by the Administrator from the requirement to transmit LRIT information.
- 9.2.3 Ships which may be granted, pursuant to the provisions of SOLAS IV/3.1 and IV/3.2.2, exemptions from the requirements of SOLAS IV/7 to IV/11 for a single voyage and not fitted with radiocommunication or other shipborne equipment which may be used to transmit LRIT information, may be exempted from the requirement to transmit LRIT information during such single voyages.
- 9.2.4 A ship experiencing terminal transmission failure should immediately notify the Administrator and include their status in the advance Notice of Arrival (NOA) to port States. Reports of its position at regular intervals, to be determined by the Administrator and the port State, should be made to the aforesaid port State authority, if provided with the means for doing so.

10.0 Administrator Authorized Operational Procedures

- 10.1 Masters of RMI-flagged ships are to request, without delay, authorization from the Administrator to reduce or terminate the transmission of LRIT information before doing so. The Administrator is to issue instructions to the Master as to whether they are granted authorization and, if so, under what circumstances and how they are to reduce, pursuant to the provisions of paragraph 4.4.1 of the Revised Performance Standards, the frequency of transmission of LRIT information or to temporarily stop the transmission of such information.
- 10.2 Masters is to make an entry in the record of navigational activities and incidents maintained in accordance with SOLAS V/28 indicating the dates and times between which:
 - .1 the shipborne equipment is authorized to be switched off or the distribution of LRIT information ceased, where international agreements, rules, or standards provide for the protection of navigational information (SOLAS V/19-1.7.1); and

- .2 the frequency of transmission of LRIT information is authorized to be reduced or temporarily stopped, for example, when a ship is, undergoing repairs, modifications, or conversions in drydock, standing by in port for extended periods awaiting berth or charter orders or is going into a hot lay-up or cold lay-up for a long period (paragraph 4.4.1 of the Revised Performance Standards).
- 10.3 In addition, the Master of a ship undergoing repairs, modifications, or conversions in drydock, standing by in port for extended periods awaiting berth or charter orders or is going into a hot lay-up or cold lay-up for an extended period of time, taking into account the instructions of the Administrator, is to inform the authorities of the Contracting Government within whose territory or jurisdiction the ship is located of the need to reduce the frequency of or temporarily stop the transmission of LRIT information. Permission from the local authority to do so is to be obtained in advance as may be required before doing so.

GENERAL OVERVIEW

11.0 Architecture

- 11.1 SOLAS provides for Contracting Governments to be entitled to receive identification, position, and time reports from:
- .1 ships registered to that member flag State wherever the ship is located;
 - .2 ships that have declared their intention to enter a port in a member State's territory;
 - .3 ships passing within 1000 nautical miles of the coastline of a member State's territory; and
 - .4 ships in an area where a Search and Rescue operation is underway.
- 11.2 The LRIT system consists of the shipborne LRIT information transmitting terminal, CSPs, ASP, LRIT Data Centre(s) (DC), including any related Vessel Monitoring System(s) (VMS), an International LRIT Data Exchange (IDE), and an IMO LRIT Data Distribution Plan (DDP).
- 11.3 LRIT information is to be provided to Contracting Governments and Search and Rescue services⁴ entitled to receive the information, upon request, through a system of National (NDC), Regional (RDC), Co-operative (CDC) Data Centres, and an International LRIT Data Centre (IDC), using where necessary, the LRIT IDE all controlled by the DDP.
- 11.4 Subject to the provisions in §1.0 of this Notice on dates of compliance, ships must automatically transmit the following LRIT information:
- .1 the identity of the ship (IMO number and name);
 - .2 the position of the ship (latitude and longitude); and
 - .3 the date and time of the position provided.

⁴ The term "search and rescue service" is defined in SOLAS V/2.5.

- 11.5 Systems and terminals used to meet the requirements of SOLAS V/19-1 must conform to performance standards and functional requirements not inferior to those adopted by IMO Resolution [MSC.263\(84\)](#), *Revised Performance Standards and Functional Requirements for the LRIT of Ships*, as amended.

12.0 Administrator Responsibilities

It is the responsibility of the Flag Administrator to implement and enforce LRIT. This Administrator must, at all times:

- .1 recognize the importance of LRIT;
- .2 recognize and respects the commercial confidentiality and sensitivity of any LRIT information it may receive;
- .3 protect the information it may receive from unauthorized access or disclosure; and
- .4 use the information it may receive in a manner consistent with international law.

12.1 National LRIT Data Centre

12.1.1 Each flag State must decide to which LRIT DC ships entitled to fly its flag are required to transmit LRIT information. Under SOLAS V/19-1, a Contracting Government may establish its own NDC. The Administrator has determined it prudent and necessary for the security of all information that must be transmitted by ships entitled to fly its flag to establish such an RMI NDC. Subject to the applicability provisions of SOLAS V/19-1, all ships entitled to fly the flag of the RMI are obliged to report to the RMI NDC. Ships are to only transmit the LRIT information to the RMI NDC.

12.1.2 The Administrator, in complying with the urgings of the IMO, imposed voluntary compliance in advance of the 31 December 2008 compliance date in order to fully test the RMI NDC and all of the shipborne terminals nominated by shipowners to be used for transmitting LRIT information. The RMI NDC was integrated with the IDE and the DDP in December 2008 and began sharing information with other test DCs at that time. The RMI NDC is fully integrated into the international LRIT production environment and is being used to assist in testing other DCs for entry into the production environment.

12.2 RMI NDC Requirements

12.2.1 The Administrator is required to provide to the RMI NDC a list of the ships entitled to fly its flag and transmit LRIT information, together with other salient details and updates, without undue delay, including updates when there are changes within the fleet.

12.2.2 The Administrator must provide to the RMI NDC the following information for each of the ships entitled to fly its flag that is required by it to transmit LRIT information:

- .1 name of ship;

- .2 IMO Ship identification number;
- .3 call sign;
- .4 Maritime Mobile Service Identity; and
- .5 Type of ship.

12.2.3 Upon the transfer of the flag of a ship from another State to the RMI, which will be required to transmit LRIT information, the Administrator is to, without undue delay, provide to the RMI NDC in addition to the information specified in §12.2.2, the following information:

- .1 the effective date and time (Universal Coordinated Time (UTC)) of transfer; and
- .2 the State whose flag the ship was formerly entitled to fly.

12.2.4 Upon the transfer of the flag of a ship from the RMI to another State or when the ship is to be taken permanently out of service, which is required to transmit LRIT information, the Administrator is to, without undue delay, provide to the RMI NDC the following information:

- .1 name of ship;
- .2 IMO Ship identification number;
- .3 the effective date and time (UTC) of the transfer, or when the ship was, or will be, taken permanently out of service; and
- .4 the State to which the flag of the ship has been transferred, if applicable.

12.2.5 The Administrator must, without undue delay, update the RMI NDC as and when changes occur to the information it has provided under §12.2.2, §12.2.3, and §12.2.4.

12.3 Transmission Charges

Ships entitled to fly the RMI flag are not to incur any charges for transmitting LRIT information in compliance with the provisions of SOLAS V/19-1 unless RMI Maritime Act, 1990 ([MI-107](#)) is amended to provide otherwise.

12.4 LRIT Coordinator Oversight

Certain aspects of the performance of the LRIT system are to be reviewed or audited by an LRIT Coordinator acting on behalf of the IMO and all Contracting Governments. The International Maritime Satellite Organization (IMSO) has been appointed by MSC 85 to take on this function. IMSO, in this capacity, audits the functions of the RMI NDC to verify its compliance with the provisions of SOLAS V/19-1 and Performance Standards.

13.0 National Vessel Monitoring System

- 13.1 A National Vessel Monitoring System (VMS) means a system established by a Contracting Government to monitor the movement of the ships entitled to fly its flag. Under the provisions of the Performance Standards established in conjunction with SOLAS V/19-1, an NDC may also serve as a National VMS and may require, as a National VMS, the transmission from ships of additional information, or of information at different intervals, or of information from ships which are not required to transmit LRIT information.
- 13.2 Under the authority granted to the Administrator in RMI Maritime Regulations ([MI-108](#)), §1.07, *Control of the Movement and Operation of Vessels*, the Administrator is availing itself of the privilege provided in SOLAS V/19-1 through the Performance Standards to use the RMI NDC as a National VMS. The Administrator expects that the National VMS will serve other valuable safety, security, and compliance monitoring functions.
- 13.3 Although the National VMS is to be collecting additional information from ships, the RMI NDC may only transmit the required LRIT information to any other DC through the IDE. Routing Rules established and controlled by the IMO within the DDP are to preclude any unauthorized access to ship information by entities other than those allowed under the provisions of SOLAS V/19-1 for security purposes.

14.0 RMI NDC Administrator/ASP Obligations

- 14.1 The Administrator made arrangements to implement the RMI NDC through a Contract of Agreement with **Pole Star Space Applications Limited** (Pole Star), an ASP. The Agreement authorizes Pole Star to establish a secure NDC, manage its regulated functional requirements, and assume the obligations of an ASP as required under the provisions of the Performance Standards established in conjunction with SOLAS V/19-1.
- 14.2 The specific ASP functions detailed in IMO Resolution [MSC.263\(84\)](#), paragraph 5.3, are to provide:
- .1 a communication protocol interface between the RMI NDC and the CSPs to enable the following minimum functionality:
 - a. remote integration of the shipborne terminal into the LRIT DC;
 - b. automatic configuration of transmission of LRIT information;
 - c. automatic modification of the interval of transmission of LRIT information;
 - d. automatic suspension of transmission of LRIT information;
 - e. on demand transmission of LRIT information; and
 - f. automatic recovery and management of transmission of LRIT information.

- .2 an integrated transaction management system for the monitoring of LRIT information throughput and routing;
- .3 to ensure that LRIT information is collected, stored, and routed in a reliable and secure manner in accordance with the Performance Standards and Functional Requirements; and
- .4 to conduct conformance testing based upon confirmation that all communication links from the terminal to satellite to CSP to ASP are direct and secure with no pseudo CSP/third party ASP involvement.

15.0 Type Approved Shipborne Terminal

- 15.1 SOLAS V/19-1.6 specifies that the shipborne terminal elected to be used to transmit LRIT information is to be of a type approved by the Administrator or an RO on its behalf.
- 15.2 Compliance with SOLAS V/19-1.6 may be demonstrated by the terminal being:
 - .1 of a type approved by the Administrator in accordance with the provisions of SOLAS V/19.1 and section 4 of the Revised Performance Standards; or
 - .2 of a type approved by the Administrator as meeting the requirements of SOLAS IV/14, and satisfactorily completing an LRIT conformance test in accordance with the procedures and provisions set out in Appendix 1 of IMO Circular [MSC.1/Circ.1307](#); or
 - .3 of a type certified by the Administrator as meeting the requirements of IEC 60945 (2002-08) and IEC 60945 Corr.1 (2008-04) on *Maritime navigation and radiocommunication equipment and systems – General requirements – Methods of testing and required test results, and satisfactorily completing an LRIT conformance test* in accordance with the procedures and provisions set out in Appendix 1 of IMO Circular MSC.1/Circ.1307.
 - .4 of a type certified by the Administrator as meeting the requirements of the provisions of SOLAS XI-2/6; and one of the following, whichever appropriately applies:
 - a. IMO Resolution [MSC.136\(76\)](#) on Performance Standards for a Ship Security Alert System (SSAS); or
 - b. IMO Resolution [MSC.147\(77\)](#) on Adoption of the Revised Performance Standards for a SSAS,
 - .5 See §17.0 below for more information with regard to the use of SSASs.

16.0 Shipborne Terminal Requirements

16.1 The shipborne terminal is to provide the functionality specified in Table 1.

Table 1

Parameter	Data to be transmitted from the shipborne terminal
Shipborne Terminal Identifier	<i>The identifier used by the shipborne terminal.</i>
Positional Data	<p>The Global Navigation Satellite System (GNSS) position (latitude and longitude) of the ship (based on the WGS84 datum).</p> <p><i>Position:</i> The terminal should be capable of transmitting the GNSS position (latitude and longitude) of the ship (based on WGS84 datum) as prescribed by SOLAS V/19-1, without human interaction on board the ship.</p> <p><i>On-demand position reports⁵:</i> The terminal should be capable of responding to a request to transmit LRIT information on demand without human interaction onboard the ship, irrespective of where the ship is located.</p> <p><i>Pre-scheduled position reports⁶:</i> The terminal should be capable of being remotely configured to transmit LRIT information at intervals ranging from a minimum of 15 minutes to periods of six (6) hours to the LRIT DC, irrespective of where the ship is located and without human interaction on board the ship.</p>
Time Stamp 1	<p><i>The date and time⁷ associated with the GNSS position:</i></p> <p>The terminal should be capable of transmitting the time associated with the GNSS position with each transmission of LRIT information.</p>

16.2 In addition to the general requirements contained in IMO Assembly Resolution [A.694\(17\)](#) on *Recommendations on General Requirements for Shipborne Radio Equipment forming part of the GMDSS and for Electronic Navigational Aids* and the provisions specified in the corresponding footnotes, the shipborne terminal is to comply with the following minimum requirements:

- .1 be capable of being controlled and programmed by the Administrator's RMI NDC Administrator/ASP;

⁵ *On-demand position reports* means transmission of LRIT information as a result of either receipt of a polling command or of remote configuration of the terminal so as to transmit at interval other than the preset ones.

⁶ *Pre-scheduled position reports* means transmission of LRIT information at the preset transmit intervals.

⁷ All times should be indicated as UTC.

- .2 be capable of transmitting LRIT information following receipt of polling commands;
 - .3 interface directly to the shipborne GNSS equipment, or have internal positioning capability;
 - .4 be supplied with energy from the main and emergency source of electrical power⁸; and
 - .5 be tested for electromagnetic compatibility taking into account the recommendations⁹ developed by the IMO.
- 16.3 The shipborne terminal is to transmit the LRIT information using a CSP satellite communication system directly serving the RMI NDC ASP whereby all communication links from the terminal – satellite – CSP –ASP are direct and secure with no third-party ASP involvement and provides coverage in all areas where the ship operates. The CSPs recognized by the Administrator and used by the RMI NDC ASP are Inmarsat, IsatM2M, and Iridium.
- 16.4 The shipborne terminal is to be set to automatically transmit the ship’s LRIT information at six (6)-hour intervals to the RMI NDC, unless an authorized LRIT Data User requesting the provision of LRIT information specifies a more frequent transmission interval.

17.0 Ship Security Alert Systems

- 17.1 The Administrator agrees with the industry view that Ship Security Alert Systems (SSAS), with their primary purpose being that of SOLAS XI-2/6, *Security*, should not, as far as possible, be used for other regulatory purposes (i.e. SOLAS Chapter V, *Safety*). The rationale for this view is due to the nature of SSAS operation. The most effective and reliable SSASs are designed as a “closed system” that provide a totally secure system with its programming and data use exclusively under the control of the associated equipment supplier/ASP and the Company Security Officer (CSO). In contrast, because the LRIT terminal must be remotely controlled and programmed by the Administrator’s ASP, the system must be an “open system.”

18.0 Duplication of Equipment

Ships engaged on international voyages in sea areas A1, A2, and A3 or A1, A2, A3, and A4, which are using, for the purpose of transmitting LRIT information, the radiocommunication equipment fitted on board for the purpose of complying with the requirements of SOLAS Chapter IV and which, for the purpose of complying with the requirements of SOLAS IV/15.6 in relation to availability, are provided with duplicated equipment, is to use only one (1) of the terminals as the primary terminal for LRIT. A

⁸ This provision should not apply to ships using for the transmission of LRIT information any of the radio communication equipment provided for compliance with the provisions of SOLAS Chapter IV. In such cases, the shipborne equipment should be provided with sources of energy as specified in SOLAS IV/13.

⁹ Refer to the IMO Assembly Resolution [A.813\(19\)](#) on general requirements for electromagnetic compatibility of all electrical and electronic ship’s equipment.

duplicate terminal may be tested for compliance and used by the shipowner as a ready backup should the primary terminal develop problems.

19.0 Shipowner Obligations

19.1 It is the responsibility of the shipowner to ensure provision of a compliant terminal which is to be of a type approved by the Administrator and conform to the Performance Standards and Functional Requirements adopted in IMO Resolution [MSC.210\(81\)](#). Refer to §15.0 above.

19.2 Existing Inmarsat C GMDSS terminals will in most cases be type approved. However, the shipowner should be aware that there is a 20-25% probability that existing Inmarsat C GMDSS terminals will not conform to the Performance Standards and Functional Requirements for a range of operational, physical, and technical reasons, including:

- .1 uncontrolled in-port log-off and/or power-down procedures;
- .2 poor antenna mounting location;
- .3 satellite line-of-sight blockage by the ship's superstructure;
- .4 interference from the ship's radar;
- .5 external wide-area radio interference in certain locations; and
- .6 most crucially the inability to meet these requirements due to out-of-date software and/or unsupported hardware,

19.3 Terminal performance is to be as reliable as possible because of the serious consequences of non-compliance. The most reliable and appropriate measures to take to ensure full terminal compliance are to:

- .1 verify with the RMI NDC ASP the compliance capabilities of the make and model of the shipborne terminal elected to be used for LRIT information transmission;
- .2 use a terminal that is designed to **“always be on”** and not capable of being reconfigured or disabled on board the vessel;
- .3 prevent, to the extent possible, interference by competing functions such as email, messaging, or Enhanced Group Calling (EGC) communications; and/or
- .4 use an integrated Inmarsat Mini-C transceiver as the optimum terminal solution.

20.0 Transfer of Flag

20.1 Compliance

Compliance is required at the time of change of flag.

20.2 LRIT CTR Validity

20.2.1 When a ship is transferring flag to the RMI which has an LRIT CTR, this is to be considered as remaining valid if the ASP which conducted the last conformance test was either Polestar, Fulcrum, or Transas, each recognized and authorized test ASPs of the RMI. However, the LRIT CTR must be re-issued by the ASP concerned on behalf of the Administrator indicating the new particulars of the ship but without requiring re-testing or altering the date of completion of the original conformance test.

20.2.2 In cases where the LRIT CTR is deemed to be no longer valid due to non-recognition by the Administrator of the original issuing ASP or the incompatibility of the shipborne terminal with the RMI NDC as determined by the RMI NDC Administrator, equipment adjustments, if necessary, and a new LRIT conformance test must be conducted. This new LRIT conformance test must be conducted by Pole Star and accompanied by the issuance of a new LRIT CTR, prior to an RO issuing the applicable Full Term Safety Certificate. In such instances, the Administrator is to assess each situation on a case-by-case basis to determine the appropriate action to be taken by the RO regarding the issuance of statutory certification.

20.3 Registration Procedures

20.3.1 Until Pole Star, the RMI NDC Administrator, has experienced all those possible ASPs testing LRIT terminals for other DCs, it is necessary to impose the following registration procedures to determine the suitability of a shipborne terminal for use in the RMI NDC:

- a. If the ship does not have an LRIT CTR, the prospective shipowner is to immediately commence the process by making contact with either Fulcrum, Pole Star or Transas.
- b. If the ship does have an LRIT CTR, the shipowner must provide a copy of the proposed ship's LRIT CTR as soon as possible to one of the Administrator's regional offices in sufficient time for compatibility assessment before registration takes place.
- c. The registering regional office is to then forward the LRIT CTR to the Administrator's Radio Service Area in Reston.
- d. the Radio Service Area in Reston is to record and forward the LRIT CTR to Fulcrum, Pole Star or Transas, as appropriate, requesting a compatibility assessment.
- e. The ASPs are to advise the Radio Service Area in Reston "yes" or "no" on whether the terminal is acceptable and whether there is a need to repeat LRIT conformance testing.
- f. the Radio Service Area in Reston is to notify the registering regional office whether or not the terminal is acceptable and whether a repeat of LRIT conformance testing is necessary, forwarding the test ASP contact information to facilitate this step.

- g. The registering regional office is then advise the shipowner of findings and instruct the shipowner to contact Fulcrum, Pole Star, or Transas to request assistance with arrangements for LRIT conformance testing as necessary.

20.4 De-commissioning/Re-commissioning Satellite Provider Services

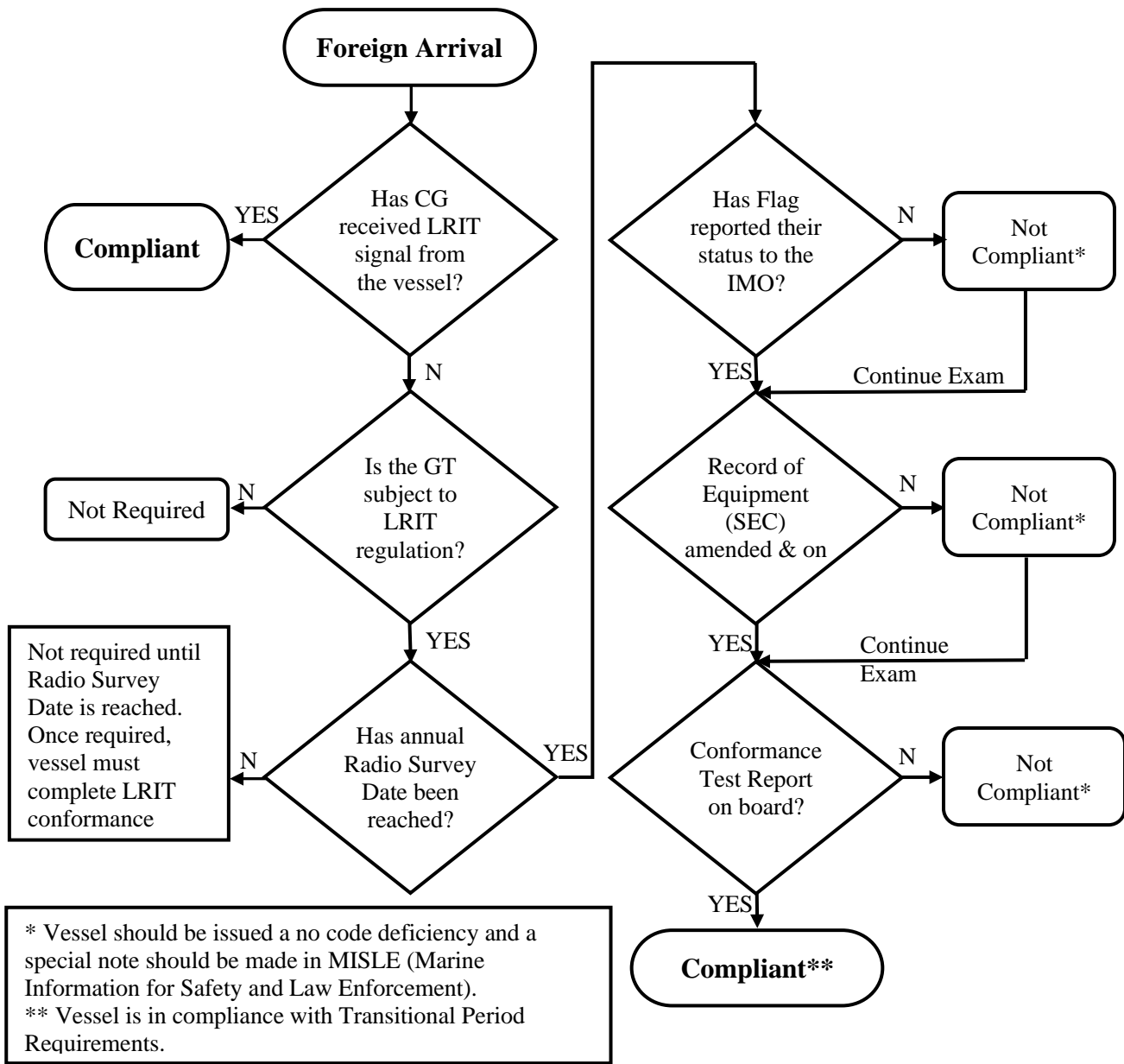
When a ship enters or leaves the Flag, as part of the transfer process there is always a de-commissioning and re-commissioning of satellite provider services for GMDSS and other communications arrangements. Upon completion, this is an indicator to the Administrator that Flag change is technically accomplished. Furthermore, it must be expected that the ship's name, Flag designation, primary and secondary LRIT system identifiers/serial numbers, and/or LRIT active/inactive status has been changed with a change of ownership and management. It is essential that these commercial details be completed in a timely manner to accomplish or maintain compliance with the requirement to transmit LRIT information at the time that Flag change occurs.

- 20.5 The status of the above Flag change will determine how the Administrator controls the ship's movements and what instructions may be necessary to be given to the ship's RO Surveyor to complete the Change of Flag Survey.

21.0 Inquiries

All parties are requested to communicate with the Administrator concerning any need for clarification, expressions of concern or assistance with problems that may arise during efforts to achieve and maintain LRIT compliance. It is the goal and intention of the Administrator to facilitate the implementation, integration, and compliance of all ships in the RMI flag subject to the new SOLAS V/19-1 requirements in whatever manner that it can without interruption to ship operations.

APPENDIX A: LRIT Compliance and Enforcement Decision Matrix



APPENDIX B: LRIT Compliance Flowchart

