



**Transport for NSW response to ACMA consultation on proposed changes to VHF maritime mobile channel arrangements**

**Re: Consultation on proposed changes to VHF maritime mobile channel arrangements**

To whom it may concern,

Thank you for the opportunity to review and provide feedback on proposed changes to VHF maritime mobile channel arrangements.

Transport for NSW (Transport) has no concerns on the proposed changes and responds to each of the six specific questions in the consultation paper below:

1. What are your views on our proposal to amend the Maritime Ship Licence LCD to replace references to 'Inmarsat' with 'recognised mobile satellite service'?
  - The proposal is supported to enable future services recognised by the IMO for use in the Global Maritime Distress and Safety System (GMDSS) to be authorised in Australia without the need for further regulatory changes.
2. What are your views on our proposal to authorise the operation of autonomous maritime radio devices (AMRDs) under the Maritime 27 MHz and VHF Class Licence and regulate their operation under the Maritime Ship Licence LCD?
  - Transport has no objection and supports the proposal to authorise the operation of AMRDs under the Maritime 27 MHz and VHF Class Licence and regulate their operation under the Maritime Ship Licence LCD.
3. Are there other scenarios where AMRD Group A stations could be used that would be consistent with the International Maritime Organisation's (IMO) designation for man-overboard (MOB) purposes?
  - Transport has no comment on this question.
4. For what purposes are AMRD Group B stations being used? Please provide examples and information on how they operate.
  - Transport has no comment on this question.
5. Are there purposes, other than those described in ITU-R M.2135-1, that AMRD Group B stations could be used for? Please provide examples and information on how they would operate.
  - Transport has no comment on this question.
6. What are your views on our proposed changes to enable a new VHF Data Exchange System (VDES) satellite component?
  - Transport supports the proposal.

Regards,

**Sally Webb**  
Deputy Secretary  
Safety, Environment and Regulation  
Transport for NSW