 Input paper: [[1]](#footnote-1) VTS39-9.2.4

Input paper for the following Committee(s): check as appropriate Purpose of paper:

**□** ARM **□** ENG **□** PAP **□** Input

**□** ENAV **□** VTS **□** Information

Agenda item [[2]](#footnote-2) 9

Technical Domain / Task Number 2 9.2

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IALA Recommendation V-128, Ed. 4 approval

# Summary

Kongsberg Norcontrol IT AS objects to the quality and proposed approval process for Input paper VTS39-9.2.1 as Edition 4 of the IALA Recommendation V-128. We are concerned that the approval of Input Paper 9.2.1 will:

1. Harm implementation of VTS worldwide
2. Harm IALA’s reputation.

## Purpose of the document

The purpose of this Input Paper is to explain our rationale and to:

1. raise awareness within the VTS Committee about some of the short-comings of Input Paper VTS39-9.2.1 and
2. propose a new work package with associated approval process.

## Related documents

The related documents are the VTS39:

1. Input Papers 9.2.1 and 9.2.2 and
2. Input Paper 3.1.4 and
3. IALA Secretariat email subject title; VTS39 - Important information and first invitation to VTS39.

# Background

After concerns were raised at VTS38, it was agreed to hold an inter-sessional meeting but it is important to note that the purpose of this meeting was limited to only review:

1. Section One (1) – Core Operational and Technical Requirements
2. Comments previously submitted to the other twelve (12) sections.

The VTS Committee should be aware that if the approval process outlined in Related documents c) above is followed; the vast majority of the new IALA Rec. V-128, Ed 4 will not have been peer reviewed by the VTS Committee at large and only a select few.

# Discussion

IALA Recommendation V-128 is one of the main Recommendations/Guidelines produced by IALA. It is a primary reference used by VTS Authorities around the world and it is essential that it is:

1. Impartial and unbiased
2. User-friendly and most importantly understandable by its target readership.

It is Kongsberg Norcontrol IT’s opinion that Input Paper 9.2.1 fails in respect to the above points.

The likely result is that authorities worldwide, especially those in emerging countries that are considering whether to implement a VTS or not will be discouraged due to the huge size and complexity of the Recommendation.

# References

The following references are given as examples of some of the short-comings (impartial, user-friendly and understandable) from Input Paper 9.2.1:

1. Section 6 – RDF, Chap 6.2.2; 2nd bullet point on page 80 states “*The delay between signal detection and output for presentation should be no more than 3 seconds*”. Why 3 seconds? Why not 2.5 seconds or 5 seconds, etc? What is the basis for being so very specific, which will clearly favour one manufacturer over another? This should be written in such a way that it is linked to the operational requirements rather than some arbitrary figure that suits manufacturers.
2. Section 8 – Radio Communications in VTS, Chap 8.3.1 - Coverage; page 86 describes the GMDSS Areas 1-4. Why? At best this Chapter will cause confusion especially when there is another chapter titled “Radio Communications Coverage” (8.4.1) also describing coverage.
3. Section 8 – Radio Communications in VTS, Chap 8.4 - Requirements; page 87 states “*Shipborne equipment should meet the functional requirements of the relevant IMO performance standards and the ITU-R Radio Regulations (see section 8.2, References above). Shore based equipment should also conform to the appropriate local technical standards.*”. So in this chapter, IALA will be stating that it is a requirement for shore based Radio Communications equipment to comply with “*relevant IMO performance standards and the ITU-R Radio Regulations”* and “*also conform to the appropriate local technical standards”*. What are the “*relevant IMO performance standards and the ITU-R Radio Regulations*”? Is this really what IALA wants to recommend?
4. Section 8 – Radio Communications in VTS, Chap 8.4.4; page 87 states “*The VTS Authority shall have the facility to automatically record radio communications and play back these recordings in synchronisation with the recorded traffic situation*”. To my knowledge, IALA rarely uses the word “shall” in (Standards), Recommendations or Guidelines. Why is IALA mandating what a VTS Authority shall do? In fact, Input Paper 9.2.1 has used the word “shall” 17 times.
5. Section 9 – Data Processing. This whole section is extremely technical; so much so that I defy any VTS authority who doesn’t have English as their mother tongue, a highly developed Engineering background and experience of VTS technologies to understand the content. The result will be that the target readership will either ignore the Section or misuse it; both of which are dangerous.

An example is Chapter 9.3.2.2 – Track Initiation on page 96, which states:

“*The complexity of the track initiation process and the complexity of the sensor network employed in different classes of VTS system can be designed to modify the trade-off between instantaneous plot PD, initiation delay, track initiation range of targets and false track rate. For example, for a given false track initiation rate, a complex initiation algorithm with highly specified multiple radars can operate predictably with plot PD of 0.7 whereas to maintain control of the false track initiation rate in a simpler initiation process using a single low performance sensor, it might be more appropriate to operate with a plot PD of 0.9 (0).*

Table 21 Suggested Radar Plot Detection Probabilities for Track Initiation

|  |  |  |
| --- | --- | --- |
| ***Recommendation Level*** | | |
| ***Basic*** | ***Standard*** | ***Advanced*** |
| *0.9* | *0.8* | *0.7* |

Not only is this difficult to understand but it also leaves the reader believing that “Advanced” is better than “Basic”. The VTS Committee should also be aware that the version of Input Paper 9.2.1 that was nearly approved at VTS38 had an additional line in the corresponding table called “Safety”. It is interesting that this line has been removed.

# Action requested of the Committee

The above examples are just a selection. I know there are members of the VTS Committee who just want to approve Input Paper 9.2.1 because it has been worked on for more than 4 years but the VTS Committee is asked to consider whether that is justification for releasing an important Recommendation that is poor quality and not understandable by its target readership?

Not all VTS systems need to be so complex and this Recommendation does not make that clear. This Recommendation will discourage implementation of VTS especially in emerging countries, it will harm IALA reputation and the VTS Committee is therefore requested to:

1. Not approve Input Paper 9.2.1
2. Add a new Work Package to produce an acceptable Edition 4
3. Follow the normal approval process including a page-by-page review.

1. Input document number, to be assigned by the Committee Secretary [↑](#footnote-ref-1)
2. Leave open if uncertain [↑](#footnote-ref-2)