

Commonwealth of Dominica



Office of the Maritime Administrator

Policy Letter: 01-15 – Long Range Identification and Tracking (“LRIT”)

Applicability: All Commonwealth of Dominica flagged vessels compliant with SOLAS chapter V regulation 19-1 on LRIT

1. Dominica Vessels Required to Comply with SOLAS Chapter V Regulation 19-1

1.1 Subject to the provisions of this Policy Letter, SOLAS chapter V regulation 19-1 shall apply to the following types of Dominica flagged vessels engaged on international voyages:

- .1 passenger ships, including high-speed passenger craft, any gross tonnage;
- .2 cargo ships, including high-speed craft, of 300 gross tonnage and upward and operating outside of sea area A1;
- .3 self-propelled mobile offshore drilling units, not on location;
- .4 commercial yachts of 300 gross tonnage and upwards; and
- .5 commercial fishing vessels, any gross tonnage and irrespective of area of operation.

1.2 Ships authorized to operate in and fly the Dominica flag shall immediately comply with SOLAS chapter V regulation 19-1 and be fitted with a terminal that shall automatically transmit LRIT information.

2. Sea Areas of Operation

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 70 degrees latitude require a non-Inmarsat terminal that operates in conjunction with a low-earth orbit Communication Service Provider (CSP) system approved by the Administration in conjunction with its appointed Application Service Provider (ASP).

3. Terminal LRIT Conformance Testing

3.1 Generally

- 3.1.1 Vessels compliant with SOLAS chapter V regulation 19-1 shall undergo a LRIT conformance test to demonstrate compliance of a ship's shipborne terminal compliance with LRIT functional performance standards and requirements. The terminal compliance testing program lasts from 30 to 48 hours from operational activation.
- 3.1.2 On satisfactory completion of a shipborne terminal conformance test, the Authorized Service Provider ("ASP") conducting the test shall 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 Conformance Test Report ("CTR") in the format conforming to the model set out in Annex 1. This may take 7 to 14 days which must be taken into consideration when preparing for the "first survey" of the vessel.

3.2 Test Reports

- 3.2.1 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 shall be placed on board with copies provided to the ship's Designated Person Ashore (DPA) and the Administration for record keeping and database entry.
- 3.2.2 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 such time as 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.
- 3.2.3 The CTR should be read as the "Conformance Test Report" and should not be mistaken for the conformance test results. Classification Societies are reminded not to issue a full term Safety Equipment Certificate on the basis of the conformance test results.

3.3 LRIT CTR Validity

- 3.3.1 When a ship is transferring flag to Dominica and has an LRIT CTR, the CTR shall be considered as remaining valid if the ASP which conducted the last conformance test was either Pole Star, Fulcrum or Transas, each recognized and authorized Test ASPs of the Commonwealth of Dominica. However, the LRIT CTR must be re-issued by the ASP concerned on behalf of the Administration indicating the new particulars of the ship but without requiring re-testing or altering the date of completion of the original conformance test.
- 3.3.2 In cases where the LRIT CTR is deemed to be no longer valid due to non-recognition by this Administration of the original issuing ASP or the incompatibility of the shipborne terminal with the Dominica NDC as determined by the Dominica 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 issuance of the applicable Full Term Safety Certificate. In such instances, the Administration shall assess each situation on a case-by-case basis to determine the appropriate action to be taken with regard to the issuance of statutory certification.

3.4 Ships with Existing Dominica CTRs

- 3.4.1 As of 1 June 2015 the Commonwealth of Dominica will no longer require annual reissuance of a ships CTR and all CTRs issued after 1 June 2015 will not be issued with an expiration date.
- 3.4.2 Ships holding a CTR with an expiration date shall apply to an ASP before the expiration of the CTR and request from an ASP a new CTR which shall be issued without an expiration date.

4. Authorized LRIT Conformance Test ASPs

- 4.1 Pursuant to the provisions of paragraph 6.1-6.3 of MSC.1/Circ.1307, as may be amended or superseded, regarding “Guidance on the survey and certification of compliance of ships” with the requirement to transmit LRIT information, Pole Star Space Applications Ltd (Pole Star), Fulcrum Maritime Systems Ltd. (Fulcrum) and Transas Telematics Limited (Transas), each leading providers of satellite tracking services, have been appointed to act on behalf of the Commonwealth of Dominica and the Administration as authorized testing ASPs.
- 4.2 Pole Star, Fulcrum and Transas have certified and the Administration has determined that their LRIT Conformance Test Services fully comply with the shipborne terminal testing requirements, procedures and tolerances detailed in Appendix 1 of MSC.1/Circ.1307 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 Conformance Test Reports.

4.3 To discuss LRIT terminal requirements further and to ensure shipborne terminals are LRIT compliant, shipowners/operators are advised to contact:

- Pole Star at (lrittesting@polestarglobal.com);
- Fulcrum at (asptesting@fulcrum-maritime.com); or
- Transas at (lrit@transas.com).

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

5. Exemptions and Equivalentents

5.1 General

5.1.1 Although the provisions of SOLAS Chapter V, Regulation 19-1 do not include any expressed provisions which allow or enable the Administration to grant exemptions from, or equivalentents to, the requirement to transmit LRIT information, when such exemptions or equivalentents are warranted, the Administration may consider invoking, in lieu, the provisions of SOLAS Chapter V, Regulation 3.2 when considering or granting any exemptions or equivalentents to the provisions of SOLAS Chapter V, Regulation 19-1.

5.1.2 The Administration may consider granting to individual ships exemptions or equivalentents of a partial or conditional nature, when any such ship is engaged on a voyage where the maximum distance of the ship from the shore, the length and nature of the voyage, the absence of general navigational hazards, and other conditions affecting safety are such as to render the full application of SOLAS Chapter V unreasonable or unnecessary, taking into account the effect such exemptions and equivalentents may have upon the safety of all other ships.

5.1.3 In such cases, the Administration shall be adhering to the provisions of SOLAS Chapter V, Regulation 3.3 which requires the submission to the International Maritime Organization (IMO) a report summarizing all new exemptions and equivalentents granted under SOLAS Chapter V, Regulation 3.2 giving the reasons for granting such exemptions and equivalentents.

- 5.1.4 The Administration, when invoking the provisions of SOLAS Chapter V, Regulation 3.2, shall be taking, in addition to what is expressly stipulated in the aforesaid regulation, the effect such exemptions or equivalents may have on measures established by the IMO with a view to enhancing maritime security and shall 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.
- 5.1.5 Notwithstanding any additional conditions which the Administration may stipulate when granting exemptions or equivalents from the requirement to transmit LRIT information, the ship concerned may be required, in lieu of transmitting LRIT information, to either:
- .1 provide a copy of the voyage or passage plan 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
 - .2 report its positions at regular intervals, to be determined by the Administration taking into account the specific voyage or passage plan, to the aforesaid Contracting Governments, if provided with the means for doing so.

5.2 Special Circumstances

- 5.2.1 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 Chapter I, Regulation 4(a), exemptions from the requirements of SOLAS Chapter IV, Regulations 7 to 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 Dominica.
- 5.2.2 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 Administration from the requirement to transmit LRIT information.
- 5.2.3 Ships which may be granted, pursuant to the provisions of SOLAS Chapter IV, Regulations 3.1 and 3.2.2, exemptions from the requirements of SOLAS Chapter IV, Regulations 7 to 11 for a single voyage and not fitted with radio communication or other shipborne equipment which may be used to transmit LRIT information, may be exempted from the requirement to transmit LRIT information during the course of such single voyages.

5.2.4 A Ship experiencing terminal transmission failure should immediately notify the Administration and include their status in the advance NOA to port States. Reports of its position at regular intervals, to be determined by the Administration and the port State, should be made to the aforesaid port State authority, if provided with the means for doing so.

6. Administration Authorized Operational Procedures

6.1 Masters of ships entitled to fly the Dominica flag shall request without undue delay authorization from the Administration to reduce or terminate the transmission of LRIT information before doing so. The Administration shall issue instructions to the master as to whether he/she is granted authorization and, if so, under what circumstances and how they are to reduce, pursuant to the provisions the Revised Performance Standards, the frequency of transmission of LRIT information or to temporarily stop the transmission of such information.

6.2 Masters shall make an entry in the record of navigational activities and incidents maintained in accordance with SOLAS, Chapter V, Regulation 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 Chapter V, Regulation 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.

6.3 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 Administration, shall 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 shall be obtained in advance as may be required before doing so.

7. Transmission Charges

Ships entitled to fly its flag shall not incur any charges for transmitting LRIT information in compliance with the provisions of SOLAS chapter V regulation 19-1.

8. National Vessel Monitoring System

8.1 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 chapter V regulation 19-1, a National Data Center (“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.

8.2 Under the authority granted to the Deputy Maritime Administrator in the Dominica International Maritime Act section 59.2, the Administration is availing itself of the privilege provided in SOLAS chapter V regulation 19-1 through the Performance Standards to use the Dominica NDC as a National VMS. The Administration expects that the National VMS will serve other valuable safety, security and compliance monitoring functions.

8.3 Although the National VMS may collect additional information from ships, the Dominica 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 shall preclude any unauthorized access to ship information by entities other than those allowed under the provisions of SOLAS chapter V regulation 19-1 for security purposes.

9. Dominica NDC Administrator/ASP Obligations

9.1 The Dominica NDC has been established through an 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 chapter V regulation 19-1.

9.2 The Commonwealth of Dominica hosts the Caribbean Cooperative Data Centre and the Dominica NDC provides LRIT services to the Maritime Administrations of Belize, Jamaica and Guyana.

10. Ship owner Obligations

- 10.1 It is the responsibility of the ship owner to ensure provision of a compliant terminal which shall be of a type approved by the Administration and conform to the Performance Standards and Functional Requirements adopted by the IMO.

11. Violations

- 11.1 Any vessel found to have a terminal deactivated or not reporting in violation of the applicable Long Range Identification and Tracking (LRIT) requirements listed above will be subject to the imposition of a fine up to the amount of \$50,000.00 USD per incident.

Any questions can be directed to:

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