

# Mariners' Advisory Committee

for the Bay & River Delaware

Organized 1964

Captain Stephen Roberts, Chairman

Captain Rick Iuliucci, Treasurer

Captain H. Hickman Rowland Jr., Secretary

Captain Joseph F. Bradley, Honorary Chairman



May 31, 2013

Docket Management Facility (M-30)  
U. S. Department of Transportation  
West Building Ground Floor, Room W12-140  
1200 New Jersey Ave. SE  
Washington, DC 20590-0001

Subj.: Docket # USCG 2013-0054 / Nationwide Differential Global Positioning System

To whom it may concern:

The Mariners Advisory Committee for the Bay & River Delaware (MAC) is the Harbor Safety Committee for the ports on the Delaware River. Formed in 1964, it is comprised of master mariners, pilots and other maritime professionals and concerns itself with safety of navigation, with particular regard to large ocean going vessels. The MAC works closely with the U.S. Coast Guard, National Oceanic and Atmospheric Administration (NOAA), U.S. Army Corp of Engineers, commercial vessel and terminal operators, and port industry personnel to recommend and promote safe navigation practices on the Delaware Bay and River, as well as the approaches to this very important waterway.

As the chairman of the Mariners Advisory Committee and a maritime pilot, I write to you today to express my grave concerns about the defunding of one of the most critical components of the safety system on the Delaware River Basin: the National Differential Global Positioning System.

Pilots on the Delaware River have been using Portable Pilot Navigation System (PPU) since 1994 when PPUs were first developed. Combining the GPS signal with a local differential correction allows for navigational accuracies that cannot be matched by using GPS signals alone. Having highly repeatable accuracy in the Portable Pilot Navigation Systems that we carry enables pilots to confidently and safely perform our job during those times when the ship installed equipment that we would otherwise be dependent upon fails or isn't capable of providing accurate own ship positioning. On the Delaware River, with its long and narrow channel, there are places that the uncorrected GPS accuracy of 10-30 meters is simply not precise enough and could result in groundings, collisions and other such accidents.

The FAA's Wide Area Augmentation System has been touted as DGPS's replacement. Pilots view WAAS as a poor choice for Marine GPS augmentation because it is a satellite based system that requires

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consistent line of sight to a low elevation geosynchronous satellite. When using a portable application such as ours, it is not always possible to place the system antenna in an optimal position for consistent reception of the WAAS correction signal. Practical experience with WAAS has also demonstrated that GPS augmentation by WAAS does not consistently provide the necessary position accuracy and reliability in all geographic areas. WAAS' current lack of real-time integrity monitoring falls short of the level of service we rely upon.

As a career maritime pilot and the chairman of the harbor safety committee, I strongly believe that discontinuing the NDGPS program will result in a significant reduction in the safety of navigation on the Nation's waterways. The MAC adamantly recommends that funding for the NDGPS be maintained.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "S. Roberts", with a long horizontal flourish extending to the right.

Captain Stephen A. Roberts, Chairman

Mariners Advisory Committee

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