

SUB-COMMITTEE ON NAVIGATION,  
COMMUNICATIONS AND SEARCH AND  
RESCUE  
6th session  
Agenda item 22

NCSR 6/22/1  
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## ANY OTHER BUSINESS

### Testing of float-free recording medium capsules

Submitted by the International Association of Classification Societies (IACS)

#### SUMMARY

*Executive summary:* This document provides the views of IACS on apparent gaps in MSC.1/Circ.1040/Rev.1 regarding the testing of the float-free recording medium capsule in voyage data recorder systems as per resolution MSC.333(90). The document also proposes consequential amendments to MSC.1/Circ.1222.

*Strategic direction, if applicable:* 6

*Output:* None

*Action to be taken:* Paragraph 10

*Related documents:* Resolution MSC.333(90); MSC.1/Circ.1040/Rev.1 and MSC.1/Circ.1222

#### Introduction

1 SOLAS regulation V/18.8 requires that the Voyage Data Recorder (VDR) system, as required by regulation V/20, including all sensors, shall be subjected to an annual performance test. MSC 82 approved the *Guidelines on annual testing of Voyage Data Recorders (VDR) and simplified Voyage Data Recorders (S-VDR)* (MSC.1/Circ.1222).

2 SOLAS regulation IV/15.9 requires satellite EPIRBs to be annually tested. MSC 90 approved the *Revised Guidelines on Annual Testing of 406 MHz Satellite EPIRBs* (MSC.1/Circ.1040/Rev.1).

3 Governments are recommended to ensure that VDRs installed on or after 1 July 2014 conform to performance standards not inferior to those specified in the annex to the *Revised Performance Standards for Shipborne Voyage Data Recorders (VDRs)* (resolution MSC.333(90)). Paragraph 5.2.2.3 of this resolution states that the float-free recording medium capsule should "be so constructed as to comply with the

requirements specified in resolution A.810(19)\* and to minimize risk of damage during recovery operations".

### Discussion

4 Although resolution MSC.333(90) states that the float-free capsule of the VDR should meet the EPIRB performance and construction requirements as specified in resolution A.810(19), the float-free capsule does not perform the same functions as an EPIRB. IACS therefore questions if the float-free capsule should be regarded as an EPIRB and considers that it should not be tested in accordance with MSC.1/Circ.1040/Rev.1.

5 In light of paragraph 4 above, IACS considers that the float-free capsule should be tested as a component of the VDR system in accordance with SOLAS regulation V/18.8, as detailed in MSC.1/Circ.1222.

6 However, MSC.1/Circ.1222 does not provide any specific testing provisions for the float-free capsule, apart from "confirmation that the capsule float-free arrangements, where required or fitted, are satisfactory as originally accepted at commissioning" (annex, paragraph 2.7).

### Proposals

7 In order to properly accommodate and clarify testing of the float-free capsule, it is proposed to amend MSC.1/Circ.1222, annex, paragraph 2.7, as follows (additions/deletions):

"7 confirmation that the capsule float-free arrangements, where required or fitted, are satisfactory as originally accepted at commissioning; and that any battery, release mechanism or other datable items are within their expiry date. In addition, for float-free capsules approved in accordance with resolution MSC.333(90), the examination should be carried out in accordance with sections 2, 3.1, 3.3 to 3.12, 3.14 and 3.15 of the annex to MSC.1/Circ.1040/Rev.1, subject to "EPIRB" is to be read as "VDR float-free capsule"; and,".

8 If the proposal in paragraph 7 above is agreed, then IACS suggests that the tables in the appendix to MSC.1/Circ.1222 should be modified accordingly.

9 IACS also notes that MSC.1/Circ.1222 has not been updated to take account of some of the additional data items to be recorded according to resolution MSC.333(90). In this regard IACS proposes that the following be added to the table in section "8. Interfaces: Operation and recording" in MSC.1/Circ.1222 (additions/deletions):

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\* Recommendation on Performance Standards for Float-Free Satellite Emergency Position- Indicating Radio Beacons (EPIRBs) Operating on 406MHz.

**"8. Interfaces: Operation and recording**

...	...				
Radar data - post display selection	Master radar display (both radars, where applicable)				
ECDIS	ECDIS display in use, where fitted				
AIS	All AIS data				
Rolling motion	Electronic inclinometer, where fitted				
Configuration data	Where applicable				
Electronic logbook	Where fitted				
Water depth	Echo sounder				
...	...				

**Action requested of the Sub-Committee**

10 The Sub-Committee is invited to consider the foregoing, in particular the proposals in paragraphs 7 to 9 above, and take action as appropriate.

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