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United States Coast Guard

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COMDTINST 16575.1A  
28 FEB 2017

COMMANDANT INSTRUCTION 16575.1A

Subj: PROCESSING OF GLOBAL POSITIONING SYSTEM (GPS) INTERFERENCE TEST REQUESTS

Ref: (a) National Security Presidential Directive/NSPD-39, 8 December 2004, U.S. Space-Based Positioning, Navigation and Timing Policy  
(b) Memorandum between the Department of Defense (DOD) and the Department of Transportation (DOT), November 2008, Civil Use of the Global Positioning System  
(c) CJCSM 3212.03A, 8 November 2013, Performing Tests, Training, and Exercises Impacting the Global Positioning System (GPS)

1. PURPOSE. This Instruction supplements References (a), (b), and (c). It provides specific guidance, responsibilities and authority necessary to efficiently process DOD-sponsored GPS interference test requests within the Coast Guard.
2. ACTION. Area and District Commanders and Commanding Officer of Coast Guard Navigation Center (NAVCEN) must ensure compliance with the provisions of this Instruction.
3. DIRECTIVES AFFECTED. PROCESSING OF GLOBAL POSITIONING SYSTEM (GPS) INTERFERENCE TEST REQUESTS, COMDTINST 16575.1 is cancelled.
4. DISCUSSION.
  - a. On a periodic basis Department of Defense (DOD) and selected other agencies, e.g., National Aeronautics and Space Administration (NASA), conduct testing or other activities which may infringe on the Global Positioning System (GPS) frequency band. During the planning stages of these tests and activities, DOD has committed to requesting approval of the testing from Department of Homeland Security (DHS) in an attempt to reduce impacts on civil GPS users.

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NON-STANDARD DISTRIBUTION:

- b. Particularly important to the Coast Guard is the potential impact on “safety of life” in the harbor entrance and approach phase of maritime navigation. The Coast Guard operates the Nationwide Differential GPS (NDGPS) Service to meet this safety requirement. The Department of Transportation’s (DOT) designated point of contact for GPS-band test approval is the Federal Aviation Administration (FAA). An Information Dissemination Coordination Team (IDCT), comprised of representatives from all agencies involved in the approval process, implements the DOD/DHS relationship that is formalized in Annex 3 to Reference (b). The GPS Interference Test Approval (GITA) process was developed to facilitate test approval within the framework of Annex 3.
  - c. The Coast Guard will receive notification of proposed testing from U.S. Strategic Command (USSTRATCOM), and will analyze the impact on the maritime community. The FAA will determine the impact on the aviation community and will perform their own impact analysis.
5. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is intended to provide operational guidance for Coast Guard personnel and is not intended to nor does it impose legally-binding requirements on any party outside the Coast Guard.
6. MAJOR CHANGES. Major changes to this system include the addition of: reflecting Coast Guard’s transition from Department of Transportation to Department of Homeland Security; changes to Department of Defense naming convention; changing signatory to Commandant (CG-5P), to align with new NAVCEN Chain of Command; updated postal information.
7. IMPACT ASSESSMENT. Each District must designate a point of contact for maritime safety and other GPS interference testing impact review. In most cases this designation is at the Waterway Management (dpw) level. Should NAVCEN determine the potential exists for testing to impact U.S. navigable waters, they will request a review by that District of maritime safety impacts based upon knowledge of local conditions, types of maritime traffic, hazardous cargoes being transported, local events, local pilot dependency upon GPS/DGPS, planned events or operations, and other impacts of the tests. Districts must respond to NAVCEN preferably within 5 days of, but no later than the suspense date. If the District determines the impact is acceptable, NAVCEN will provide recommended text to the District for a Notice to Mariners. No new resources are being provided for this task.
- a. PERSONNEL RESOURCES REQUIRED. This existing task requires each District maintains a point of contact for maritime safety and other GPS interference testing impact review. Should NAVCEN determine the potential exists for testing to impact U.S. navigable waters, they will request a review by the affected District of maritime safety impacts based upon knowledge of local conditions, types of maritime traffic, hazardous cargoes being transported, local events, local pilot dependency upon GPS/DGPS, planned events or operations, and other impacts of the tests. Districts must respond to NAVCEN preferably within 5 days of, but no later than the suspense date. No new resources are being provided for this task.
  - b. TRAINING REQUIRED. No new or additional training is required. If District representatives require assistance reading test coordination information they should call the NAVCEN NIS Watch and/or NAVCEN PNT Branch during working hours Monday-Friday at (703) 313-5900.

- c. FUNDING. There is no additional funding required for this existing task to continue.
8. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.

- a. Environmental considerations under the National Environmental Policy Act (NEPA) were examined in the development of this Commandant Instruction without substantive change. It is categorically excluded from further NEPA analysis and document requirements under Categorical Exclusion #33 as published in National Environmental Policy Act Implementing Procedures and Policy for considering Environmental Impacts, COMDTINST M16475.1 (series), Figure 2-1. An Environmental Checklist and Categorical Exclusion Determination (CED) are not required.
- b. This Directive will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policies in this Instruction must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.

9. DISTRIBUTION. No paper distribution will be made of this Instruction. An electronic version will be located on the following Commandant (CG-612) web sites. Internet: <https://www.uscg.mil/directives/>, and CGPortal: <https://cgportal2.uscg.mil/library/directives/SitePages/Home.aspx>.

**NOTE:** If paper copies are required please complete Certificate for Need of Printing, DHS Form 500-07, which can be found at [https://www.uscg.mil/directives/Printing\\_Graphics.asp](https://www.uscg.mil/directives/Printing_Graphics.asp).

10. PROCEDURE.

- a. NAVCEN is responsible for analyzing the information to determine the impact of interference/testing on the U.S. Coast Guard's DGPS broadcast sites, navigable waterways and maritime/civil users. After careful analysis and District input, NAVCEN will either concur or refer the request to Assistant Commandant for Prevention Policy (CG-5P).
- b. NAVCEN will transmit concurrence or non-concurrence responses to USSTRATCOM. If Coast Guard concurs, USSTRATCOM will produce and disseminate a USSTRATCOM Approval for GPS Testing Memorandum before the requested test date. If Coast Guard does not concur, NAVCEN will forward the reason to USSTRATCOM.
- c. "Cease Buzzer" is a procedure whereby authorized officials can quickly halt a specific test because the test is creating problems that were not anticipated or expected during the test planning phase. NAVCEN will be responsible for having at the ready all "Cease Buzzer" information on the days of testing. For each test the "Cease Buzzer" information will be found within the body of the USSTRATCOM Approval for GPS Testing Memorandum. District points of contact should be aware of this procedure and notify NAVCEN's watchstander at (703) 313-5900 for any of the reasons indicated below to stop the testing. NAVCEN is authorized to call the "Cease Buzzer"

point of contact to stop the testing if:

- (1) There is reason to believe the testing is adversely impacting search and rescue efforts, etc.; or
- (2) There are events/traffic that will be adversely impacted by the loss of GPS/DGPS in the maritime area, e.g., Liquefied Natural Gas (LNG) Carrier in final approach to designated harbor; or
- (3) There is reason to believe the testing is affecting areas not expected to be affected, e.g., DGPS Sites.

11. RECORDS MANAGEMENT CONSIDERATIONS. This Instruction has been evaluated for potential records management impacts. The development of this Instruction has been thoroughly reviewed during the directives clearance process, and it has been determined there are no further records scheduling requirements, in accordance with Federal Records Act, 44 U.S.C. 3101 et seq. National Archives and Records Administration (NARA) requirements, and the Information and Life Cycle Management Manual, COMDTINST M5212.12 (series). This policy does not have any significant or substantial change to existing records management requirements.
12. POLICY. This Instruction is concerned primarily with Coast Guard and DOD coordination. It must be understood that testing affecting GPS is necessary for national security interests. The goal is to create an environment of cooperation among various DOD, DHS and DOT agencies involved in GPS interference testing, such that a balance is achieved between the requirements of civil transportation safety and national security interests. Reasonable efforts should be made to avoid denial of necessary testing, while at the same time avoid placing mariners or civil users of DGPS/GPS in a hazardous environment created by such testing. The DOD and Coast Guard will make every effort to reach concurrence. The Coast Guard does not have authority to approve or disapprove any GPS Test. The final approving authority for GPS Testing rests solely with Department of Defense.

Ideally, testing would be conducted in such a manner that the mariner or civil user would not be affected. In most cases, however, a compromise may be achievable and should be sought so that the goals of the interference testing can be met, and the impact on navigable waterways kept to a minimum. Every effort will be made to negotiate with the testing agency or frequency management authority to develop a test scenario that is acceptable to DOD and the Coast Guard. Where interference to GPS/DGPS over a waterway cannot be eliminated, a Notice to Mariners will be issued as appropriate to advise mariners.

In the few instances in which a negotiated agreement on test parameters cannot be reached, and NAVCEN recommends disapproval based upon perceived threats to maritime safety, the request will be referred to Assistant Commandant for Prevention Policy (CG-5P) for final determination.

- a. RESPONSIBILITIES/AUTHORITY. Primary responsibility within the Coast Guard for processing GPS interference test requests lies with NAVCEN. NAVCEN will establish working relationships with Coast Guard Districts, the DOD Frequency Management Agency, and various other entities deemed necessary to assess GPS test impacts and negotiate acceptable GPS test parameters.

- (1) NAVCEN will develop specific standard operating procedures based upon

general guidelines in this Instruction. NAVCEN will receive notification of proposed testing from USSTRATCOM and will analyze the impact on the maritime community as part of the aforementioned IDCT process. Expected turnaround time for reply to USSTRATCOM for proposed testing will be the suspense date for those tests that will not affect navigable waters. NAVCEN must provide a concur/non-concur.

- (2) Each District must designate a point of contact for maritime safety and other GPS interference testing impact review. Should NAVCEN determine the potential exists for testing to impact U.S. navigable waters, they will request a review by that District of maritime safety impacts based upon knowledge of local conditions, types of maritime traffic, hazardous cargoes being transported, local events, local pilot dependency upon GPS/DGPS, planned events or operations, and other impacts of the tests. Districts must respond to NAVCEN preferably within 5 days of, but no later than the suspense date. If the District determines the impact is acceptable, NAVCEN must reply with concur and provide recommended text to the District for a Notice to Mariners.
  - (3) NAVCEN must ensure that the District's point of contact is made aware of the "Cease Buzzer" procedures in the event that the testing needs to be halted for reasons detailed later in this Instruction.
  - (4) If NAVCEN's preliminary review of the District's impact results in a recommendation where the District does not concur, NAVCEN must make every effort to coordinate concurrence among the partnering agencies. As a last resort, NAVCEN will refer the request to Assistant Commandant for Prevention Policy (CG-5P) for final determination. Specific examples that may require Assistant Commandant for Prevention Policy (CG-5P) review include testing that will impact a Maritime DGPS broadcast site or that will impact a major port or waterway, such as New York Harbor, or extended periods of low/high waters on Western Rivers.
- b. ASSESSMENT CONCERNS. There are two primary areas of concern to consider when making an assessment of the impact of proposed GPS interference testing on the maritime/civil user community.
- (1) The first concern involves interference testing that directly affects a DGPS broadcast site. When a DGPS broadcast site is affected, the effects of the testing extend far beyond the originally intended test area, perhaps as much as 200 nautical miles.
  - (2) The second area of concern involves interference testing affecting navigable waters and/or civil users. Of primary interest are critical waterways such as harbor entrance approaches, restricted waterways in which there exists high-density traffic involving hazardous cargoes or passenger traffic, or hazardous inlets where vessels are known to rely on GPS/DGPS to affect a safe passage. There may be other concerns involving either planned or emergency situations or critical operations that may be heavily dependent upon availability of GPS/DGPS signals.
13. FORMS/REPORTS. None.

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14. REQUEST FOR CHANGES. Units and individuals may recommend changes via the chain of command to: Commanding Officer, US Coast Guard Navigation Center, 7323 Telegraph Rd, MS 7310, Alexandria, VA 20598-7310.

P. F. THOMAS /s/  
Rear Admiral, U.S. Coast Guard  
Assistant Commandant for Prevention Policy