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August 20, 2007

Federal Communications Commission
Equipment Authorization Branch
Laboratory Division
Office of Engineering and Technology
7435 Oakland Mills Road
Columbia, Maryland 21046

Re.: Explanation of Application

FCC ID: AMWUT621A

To Whom It May Concern:

The above referenced application is based upon a previous application under TIMCO's Job Number 189AUT7 that was granted on March 2, 2007 under the FCC Identifier AMWUT621.

At the time when this model was approved, there was no provision to test the DSC circuitry on-line in accordance with Rec. ITU-R M493-11, Clause 8.5 Test Call. Recently, the United States Coast Guard has announced a new feature that will allow user testing. In order to incorporate this ability within the device, certain modifications to the internal firmware were needed to achieve this feature.

Because it was decided that a new FCC Identifier would be the best method to distinguish between the original models without this feature, versus those with the ability for user testing, a new application was required.

The changes in the firmware for the new model does not affect the data taken and reported in the previous job.

Thank you for your consideration. Please contact the undersigned if you have any questions regarding this matter.

Regards,

A handwritten signature in blue ink that reads "James R. Haynes".

James R. Haynes
Vice President, Engineering and Regulatory Affairs