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29 May 2002

Office of Engineering and Technology Laboratory
Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Rd
Columbia MD 21046-1609
USA

Subject: Orion Electronics Limited
FCC ID: EFCST800
GPS Vehicle Locator
Request for waiver of Part 22.921

22.921 - 911 Call Processing Procedures; 911-Only Calling

In the belief of Orion Electronics Limited, this section should not apply to the ST800 because the ST800 is used for automated data communications only. The ST800 cannot be used as a standard cellular phone; it is a vehicle locator capable of receiving data calls and automated data transmissions. As a vehicle locator, the ST800 unit will not provide any means for voice transmissions and thus will not provide any means of emergency voice communications/transmissions.

Sincerely,
David Roddis
Marketing Manager
Orion Electronics Limited