

Correspondence Reference Number: 38944

Form 731 Confirmation Number: EA163399

Your comment:

- 1) The test Reports are incomplete. Please submit a test report for the RTCM Standard 76-2002/SC110-STD

Reply:

The Deficiencies regarding to a test report as mentioned in your comment reference number 38944 should be covered by the waiver document which was granted on 10<sup>th</sup> May2010.

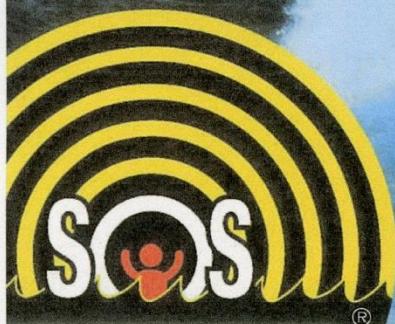
Please read from Paragraph 3 onwards within the waiver document..which refers to Subpart K – Personal Locator Beacons 95-1402 RTCM 76-2002.. etc

I also include correspondence email from James Shaffer of the FCC contact (202)418-0687 regarding this waiver.

I trust this satisfies the information you requested.

I look forward to your reply and many thanks for your time and effort in helping us complete this application

# Maritime Survivor Locating Devices



- "SOS" Man Over Board Alert & Locate Systems
- "SOS" Lost Diver Alert & Locate Systems
- "SOS" Submariner Escape Alert & Locate Systems



[www.seamarshall.com](http://www.seamarshall.com)

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HU17 8DB, United Kingdom  
sos@seamarshall.com

Federal Communications Commission,

P O Box 979097

St Louis, MO 63197-9000

United States of America.

**GRANTED**

FOR THE REASONS INDICATED BELOW

MAY 10, 2010

## WAIVER- EXPEDITED ACTION REQUESTED

3<sup>rd</sup> March 2010

Dear Sirs,

We are seeking a waiver for a new upgraded version of the man over board device Sea Marshall SMRS8 grantee coded NWGSMRS8. The device designated Sea Marshall AU9 has been introduced to comply with latest R&TTE Directive Articles 3.2 and 3.3 by compliance with ETSI norms EN 300 152-2 (Article 3.2-protection of radio spectrum), and EN 300 152-3. (Article 3.3c – access to emergency services). The AU9 is compliant with new UK Civil Aviation Authority (CAA) requirements for "Helicopter Transit" and has been demonstrated to comply with EUROCAE ED14F.

The Sea Marshall AU9 is a replacement for the previous device designated Sea Marshall SMRS8 within the scope RTCM MSLD's RTCM SC-119, for which the FCC previously granted a waiver in 1998. The AU9 is recognized as a valuable aid to rescue providing immediate warning of Man Over Board (MOB) situations in the workplace in compliance with Oil & Gas and commercial vessel operators safety cover. The AU9 is designed to be able to meet Commercial operator's safety case standards additionally includes the ability to transmit the identity of the device, with provision to include the transmission of the MOB GPS position.

The Sea Marshall AU9 device differs from RTCM and COSPAS/SARSAT Standards referenced in Part 95, subpart K. Sec. 95.1400 Basis & Purpose Compliant as shown in previous paragraphs of this

waiver request. **Sec. 95.1401 Frequency** The AU9 transmits on 121.50 MHz emission type A1D and is limited to transmission of d.3HEDS tones as specified by ITU-R-M690-1. Transmit emission level 100mW ERPEP maximum. The device does not transmit on 406MHz.

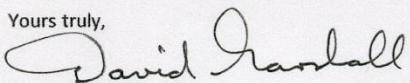
**Sec. 95.1402 Special requirements;** (a) noncompliant. (b) Part Compliant to RTCM 121.50 MHz except that does not transmit a 406 MHz signal or include the morse code letter "P" on its 121.50 transmission. (c) Noncompliant. (d) Informative only. (e) Noncompliant. (f) Noncompliant. (g) Noncompliant.

We seek a waiver request for all parts 95 1402. Including labeling. The labeling will clearly show manufacturer, equipment identifier, serial number unit identity, date of manufacture, FCC identifier mark (when granted) battery date. Emission type/ frequency. All operational instructions will be clearly indicated on non removable labeling in accordance with established industry standards.

We include with this Waiver request FCC form 159 and payment of \$175.00 fee code PDMW. *RY cc*

Thank you for your time and attention to our request.

Yours truly,



David Marshall (Chairman)

Marine Rescue Technologies Ltd

**David Marshall**

**From:** "David Marshall" <david@g3mjm.karoo.co.uk>  
**Date:** 15 June 2010 12:02 PM  
**To:** "Ray Wilson" <Ray@seamarshall.com>  
**Subject:** Fw: AU9 Waiver request

Ray  
this is letter to include  
I have colour copied the Waiver  
be back soon

**From:** [James Shaffer](#)  
**Sent:** Wednesday, May 12, 2010 2:57 PM  
**To:** [david@g3mjm.karoo.co.uk](mailto:david@g3mjm.karoo.co.uk) ; [Geoff Smith](#)  
**Subject:** AU9 Waiver request

Attached is letter granting FCC approval of your request for waiver to permit certification of your AU9 device.

Should you have any question regarding this email feel free to either call or email me with your questions.

Best Regards,

Jim Shaffer  
(202) 418-0687