

Federal Communications Commission  
Office of Engineering and Technology  
January 18, 2011

Re: FCC ID: YIBSEA157S  
FCC Registration No: 0017527912  
Form 731 Confirmation No: EA175426  
Correspondence Reference No: 39308

Subject: Reply to FCC questions regarding FCC ID YIBSEA157S

In regard to FCC questions relating to Rules, Frequencies, Emissions Designators, and RF power dated November 19, 2010, our response is as follows:

The SEA 157S VHF/ FM DSC radio is designed and intended for primary operations as a compliant Part 80 Maritime mobile transceiver.

- A. Standard production models supplied to marine dealers for resale to the boating public will be limited to compliant Part 80 Marine radio operational capabilities.
  - 1. Frequencies for these operations are specified under Rule Part 80.373.
- B. Additionally, the SEA 157S design is capable of providing spectral efficient operating modes using 12.5 kHz bandwidths for voice and limited data.
  - 1. Please note that programming of these operations are subject to controls by the manufacturer and authorized service facilities, and only available to users/operators in possession of FCC authorized frequencies for these operations.
  - 2. Use of 12.5kHz frequencies is established in Rule Part 80.371 (c) (iii)
- C. Within FCC rules governing compliant Part 80 and Part 90 operations; the FCC allows spectrum allocated to VHF Public Correspondence Areas (VSPCAs) to provide service to units on land in addition to Maritime mobiles. Further, those mobile units can be authorized to operate under Part 80 and Part 90.
  - 1. For reference; please see Rule Part 80.123, "Service to stations on land"
  - 2. Rule part 90. 20 (11) (g)(2)(i) Table A, and (ii) Table B, (3) (4) establishes the shared use of VPCSA for land mobile
  - 3. Further, that VHF Marine channel 25 is established as the Nationwide Interoperability channel
- D. Subsequently, in addition to Part 80 operations and general customer operations, SEA COM Corp is also requesting the capability to supply mobile radios to select but authorized land mobile customers that would utilize VPCSA stations for either voice or authorized data.

1. Therefore, SEA COM Corp has attached additional Part 90 test data to support its application for 12.5 kHz frequency bandwidths and applicable emissions masks for voice emissions and data emissions @ 9600BPS per 12.5kHz.
2. Our application for Equipment Authorization is first submitted as a Part 80 application and secondly as a request for acceptance under Part 90 for limited use of 12.5kHz frequencies between 156 and 162mHz.

As follows, we believe that the formatted information below is correct for the requested Equipment Authorization:

For licensed non-Broadcast station transmitters:

FCC Rules:	Frequency (mHz):	Power (Watts):	Freq. Tolerance:	Emission Designators
80	156 to 157.5	25	5 ppm	16K0F3E
80	156 to 157.5	1	5 ppm	16K0F3E
80	156 to 157.5	25	5 ppm	13K5G2D
80	156 to 157.5	1	5 ppm	13K5G2D

Further, for 12.5 kHz operation under Part 80 and Part 90:

80 and 90	156 to 162	25	5 ppm	11K2F3E
80 and 90	156 to 162	1	5 ppm	11K2F3E
80 and 90	156 to 162	25	5 ppm	11K2F2D
80 and 90	156 to 162	1	5 ppm	11K2F2D

Sincerely,  
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