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23rd July 2018

WAIVER REQUEST – EXPEDITED ACTION

Request for Waiver of FCC Rules Covering Equipment Authorisation

Dear Sir or Madam,

In the letter, Ocean Signal Ltd. requests a waiver of the rules of 47 CFR part 95K concerning the requirements of Personal Locator Beacons for the reasons discussed below.

The Radio Technical Commission for Maritime Services has recently published a revised edition of Standard 11010 "RTCM Standard 11010.3 for 406 MHz Satellite Personal Locator Beacons (PLBs)" dated June 25, 2018 which allows the optional inclusion of AIS as a locating function in addition to the 406 MHz alerting transmission and 121.5 MHz homing transmission.

The new RTCM standard defines three groups of PLB functionality:

- Group 1: 406 MHz Cospas Sarsat PLB with 121.5 MHz homing signal. The homing signal to have a minimum duty cycle of 33%
- Group 2: Reserved for future use
- Group 3: 406 MHz Cospas Sarsat PLB with 121.5 MHz homing signal and AIS position locating signals on AIS1 and AIS2

Ocean Signal is currently developing a new PLB to the revised RTCM standard and which will be capable of being configured as a Group 3 PLB.

Personal Locator Beacons are covered by 47 CFR part 95K (revised by report and order FCC 17-57) which defines the requirements for certification of PLBs. PLBs must meet RTCM Standard 11010.2 dated July 10, 2008 including amendments 1 (August 23, 2010) and amendment 2 (June 8, 2012). In addition, MSLDs must meet RTCM Standard 11901.1 dated June 4, 2012. The MSLD standard gives the performance requirements in Annex E for AIS type locator devices. These two listed standards are incorporated by reference.

Ocean Signal believes that designing PLBs to the new RTCM standard will provide users with enhanced safety. The use of AIS in maritime PLB

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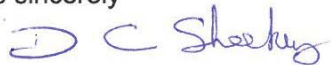
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applications will enhance the ability of the rescuing resources to accurately locate personnel. United States Coastguard rescue resources are already equipped with AIS receivers and plotting capability. The addition of AIS transmissions to the normal 406 MHz satellite transmissions provide increased location accuracy combined with the potential for increased position updates.

Ocean Signal hereby requests a waiver for the rules of CFR 47 part 95K to allow the approval of PLBs to RTCM Standard SC11010.3.

Yours sincerely

A handwritten signature in blue ink, appearing to read "D C Sheekey".

David Sheekey
Type Approval and Quality Improvement Facilitator