



Federal Communication Commission

Washington, D.C. 20554

Tjodalyng: 11.07.2019

WAIVER - EXPEDITED ACTION REQUESTED

Jotron AS, as the manufacture of the Tron 40VDR (FCC ID: VRVTRON40VDR), hereby with this letter, request "Waiver-Expedited Action Requested" set out in 47 CFR § 1.925 (b.4).

We request a waiver for 47 CFR part 80, to meet the requirements in RTCM 11000.4 Standard for 406 MHz Satellite Emergency Position Indicating Radio Beacons (EPIRB).

Our Tron 40VDR Float Free Capsule is a combined Cospas-Sarsat (TAC 185/TAC 318) and MED approved Float Free Emergency Position Indication Radio Beacon (EPIRB), and a float free storage medium. The separate VDR storage module comply to the latest VDR performance standards IMO MSC.333 (90) and IEC61996-1 Ed.2.

The Tron 40VDR is currently tested and approved according RTCM 11000.2 (RTCM Paper 77-2002/SC110-STD), Standard for 406 MHz Satellite Emergency Position-Indicating Radio Beacons (EPIRBs), June 20, 2002 (version referenced in current FCC regulations)

FCC rules states that we need to comply with the Standard RTCM 11000.3 within January 17, 2020, since no EPIRB without complying to RTCM 11000.3 can be manufactured, imported or sold in the USA after this date.

We are aware of that the RTCM 11000.4 Standard has not yet been incorporated into the regulations of the Federal Communications Commission, but it will be beneficial to meet the latest published and valid RTCM EPIRB standard.



As stated in RTCM 11000.4 Description: *"RTCM regards this standard as at least equivalent to the version cited in the regulations, so FCC authorization of EPIRBs built to this standard should be available through the FCC waiver process."*

At the moment we are in the certification process with our TCB (Nemko Canada) and an accredited test facility (TÜV SÜD Product Service). We urgently need feedback on our "Waiver-Expedited Action Requested" so we can complete the relevant testing at TÜV SÜD Product Service and continue the certification process towards obtaining a new valid FCC Grant before January 17, 2020.

To support our request for waiver we refer to the already granted McMurdo Group waiver filed January 16, 2015, adopted September 25, 2015 and released September 28, 2015 (Federal Communications Commission DA 15-1087)

This request was to permit equipment authorization for emergency position indicating radio beacon (Smartfind G8 AIS, Smartfind G8 and Smartfind E8).

Jotron AS hereby with this letter, request "Waiver-Expedited Action Requested" for the rules CFR 47 part 80 to grant permission to approve according to RTCM 11000.4.

Frank Løke

Certification Manager

Jotron AS

