



FCC
Attn. Daniel McCleary
1270 Fairfield Road
Gettysburg, PA 17325-7245
USA

ACCEPTED/FILED

AUG 29 2017

Federal Communications Commission
Office of the Secretary

Lidingö May 17, 2017

Re. Request for modified waiver – DA 15-1457 – supplemental information

Dear Sirs,

With reference to our Request for modified waiver dated February 17, 2017, we would like to supply you with additional information. In DA 15-1457 it was concluded that a site-based licensing would be necessary to ascertain the location of transmitters – we would herewith like to explain why a blanket license would be more appropriate in this case.

As stated in our letter of February 17, 2017, a telephone conference was held with the undersigned and Ed Crocella from the NTIA, together with other concerned parties. The subject of the conference was RECCO AB's wish to receive an authorization to operate in the US following a blanket license for all rescue organizations/ski areas using detectors instead of site-by-site licences. Some of our arguments are the following:

- RECCO AB owns all detectors that are placed in ski resorts/rescue teams in the US (a list of these skiareas/rescue organizations was sent together with our Request on February 17).
- The rescue teams only have the right to use the detectors in accordance with a specific agreement. The detectors must, among other requirements, be placed in a defined rescue-strategic location and may not be removed.
- Detectors may only be used by specially trained staff.


These requirements are a guarantee for RECCO AB that our property is handled correctly and very important factors for a rescue tool.

The same requirements are valid for all countries. It ensures that the RECCO system is widespread and available in important, avalanche-prone locations, without imposing unnecessary burden or cost on the rescue teams. Site-based licensing would, however, be unduly burdensome. We would rather not put this work on the rescue teams since the detectors are not their property, and they might not be used to this type of administrative tasks.

The discussion mentioned above ended with all representatives understanding RECCO AB's arguments and giving their consent.

We hope that the reasons for our request are clear and welcome you to contact us should you need any additional information.

Sincerely,


Magnus Granhed
President

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