

WT 15-197

Coastal Obs Tech Services LLC



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757-647-0764

March 25, 2014

Federal Communications Commission
P. O. Box 979097
St. Louis, MO 63197-9000

ACCEPTED/FILED

AUG 18 2015

Hello FCC,

Federal Communications Commission
Office of the Secretary

I have been advised to request a waiver of 47 CFR Part 90.248, to allow the use of land mobile frequencies 29.71, 29.73, 29.75, 29.77, 29.79 MHz to be used for ocean buoy data telemetry.

I've recently become the US agent for Datawell BV, the oldest and most respected manufacturer of wave buoys (see <http://datawell.nl>). They're located in The Netherlands and they serve oceanographic and meteorological agencies globally. Data are transmitted ashore and the standard frequencies used by Datawell are 29.760, 29.825, 29.870, and 29.925 MHz. I'm not an RF engineer, but it's my understanding that Datawell achieves a good data link at ranges up to 50 km, in large part because of the use of frequencies in this range. In discussions with:

- 1) Mr. Louis Hodges, TÜV Rheinland Group
- 2) TCB Mark Ryan, TÜV Rheinland Group (see FCC tracking number 134434)
- 3) Mr. Tim Maguire, FCC, (see FCC tracking number 368989)

it's been determined that the five requested frequencies would be more appropriate for use by the private sector (vs. Federal Government & NTIA governance), assuming a waiver can be obtained. I've included a copy of those emails for reference, as well as Form 159 and a check for \$180.00.

I appreciate any help you can provide and standby for questions or further guidance.

Thanks very much,

Mark Bushnell

cc: Tim Maguire <Tim.Maguire@fcc.gov>
Melissa Hower <Melissa.Hower@fcc.gov>

RE: [FWD: Response to Inquiry to FCC (Tracking Number 368989)]

Tim Maguire [Tim.Maguire@fcc.gov]

Sent: 3/10/2014 1:27 PM

To: mark@coastalobstechservices.com

Hi ~~Ken~~, MARK

The only change to the process that has changed is the contact. Kathy McLucas and Ken Crumbacker are no longer with the Commission. Please send the waiver request to the attention of Melissa Hower at the Gettysburg address below. Be sure the waiver request letter includes the reason for the request and that it addresses the criteria in sections 1.925(b) (2) and (3).

Best regards,

Tim Maguire

From: mark@coastalobstechservices.com [mark@coastalobstechservices.com]
Sent: Sunday, March 09, 2014 8:46 PM
To: Tim Maguire
Subject: RE: [FWD: Response to Inquiry to FCC (Tracking Number 368989)]

Hello Tim,

It's been 1.5 years since we last corresponded, my apologies for not acting sooner on your advice - I didn't want to waste anyone's effort until needed and it seems the time has come. I'm completing Form 159 and wondered if there has been any changes to the suggested process?

I think I'm seeking a waiver of 90.248, to access land mobile channels starting at center frequency 29.71 MHz - 29.79 MHz spaced every 20 kHz. I'll send a check for \$180 along with Form 159 and my waiver request to Kathy McLucas or Ken Crumbacker and yourself.

Thanks very much,
Mark Bushnell
CoastalObsTechServices LLC
757-647-0764
[cid:52fcca96a4d0b]

----- Original Message -----

Subject: RE: [FWD: Response to Inquiry to FCC (Tracking Number 368989)]
From: "Tim Maguire" <Tim.Maguire@fcc.gov>
Date: 8/31/12 11:01 am
To: "mark@coastalobstechservices.com" <mark@coastalobstechservices.com>

Hi Mark,

If you decide to limit your request to the land mobile channels, you would still need a waiver of 90.248 but not of 2.106 of the rules, which would simplify matters. There are land mobile channels starting at center frequency 29.71 MHz - 29.79 MHz spaced every 20 kHz that may be used for base or mobile operation. Keep in mind that your channel centered at 29.76 MHz would have to be adjusted 10 kHz to either side.

The waiver would permit the certification of the device and licensing of the device, so yes, those who purchase the device would be permitted to obtain a license without applying for a waiver.

Best Regards,
Tim

to the attention of Kathy McLucas or to Ken Crumbacker, and myself. They will see that the money gets deposited at the bank and claimed and then forward the package to me. Let me know if you have any additional questions.

Best Regards,

Tim Maguire

From: mark@coastalobstechservices.com <mailto:mark@coastalobstechservices.com>
[mark@coastalobstechservices.com <mailto:mark@coastalobstechservices.com>]
Sent: Tuesday, August 14, 2012 6:26 PM
To: Tim Maguire
Subject: RE: [FWD: Response to Inquiry to FCC (Tracking Number 368989)]
Hi Tim,

Thanks much for the contact. I Googled you to find your phone number and I can see you're a very busy man. Look forward to hearing from you when things gel and you have a bit of time.

Thanks,
Mark Bushnell
CoastalObsTechServices LLC
757-647-0764

----- Original Message -----

Subject: RE: [FWD: Response to Inquiry to FCC (Tracking Number 368989)]
From: Tim Maguire <Tim.Maguire@fcc.gov><mailto:Tim.Maguire@fcc.gov>
Date: Tue, August 14, 2012 3:34 pm
To: "mark@coastalobstechservices.com <mailto:mark@coastalobstechservices.com>"
<mark@coastalobstechservices.com><mailto:mark@coastalobstechservices.com>>

Mark,

I just wanted to let you know I haven't forgotten about you. I received your voice mail, but we are still mulling this over. Hopefully I will be in a position to give you some guidance tomorrow.

Best regards,
Tim

From: mark@coastalobstechservices.com <mailto:mark@coastalobstechservices.com>
[mailto:mark@coastalobstechservices.com]
Sent: Tuesday, August 07, 2012 5:38 PM
To: Tim Maguire
Subject: [FWD: Response to Inquiry to FCC (Tracking Number 368989)]

Hello Mr. Maguire,

I've been advised by the FCC/OET to contact you for information on the possibility of obtaining a waiver in order to deploy Datawell wave buoys with a HF data link. Many of the details are listed below.

Perhaps to save you some time, the four standard frequencies typically suggested by Datawell to the US Army Corp of Engineers (noted in KDB 134434) are 29.760, 29.825, 29.870, and 29.925 MHz. I see that the NTIA allowed NOAA to use 27.650 and 27.745 MHz on the authorizations they've obtained. I've received copies of those authorizations and can provide them if that helps. I don't have a copy of the DOD waiver.

Any thoughts or guidance you can provide would be very much appreciated.

Thank you,
Mark Bushnell
CoastalObsTechServices LLC
757-647-0764

----- Original Message -----

Subject: Response to Inquiry to FCC (Tracking Number 368989)
From: oetech@fccsun27w.fcc.gov<mailto:oetech@fccsun27w.fcc.gov>
Date: Tue, August 07, 2012 3:07 pm
To: Mark@CoastalObsTechServices.com <mailto:Mark@CoastalObsTechServices.com>

Class of emission (ITU-R SM 1138) 286HF1BCN

A few other details that may be important
Always battery powered, never 120VAC powered
Just one antenna with a unique connector.

FCC response on 08/07/2012

The frequencies you listed in KDB 134434 are not authorized for Part 80 buoys under Section 80.375(c). Since a Waiver is required I recommend contacting Tim McGuire of the Wireless Telecommunications Bureau (WTB):

tim.maguire@fcc.gov<<mailto:tim.maguire@fcc.gov>>

You mentioned that there was previous DoD waiver. This information would be helpful when you contact him.

Attachment Details:

Do not reply to this message. Please select the Reply to an Inquiry Response<<http://www.fcc.gov/labhelp>> link from the OET Inquiry System to add any additional information pertaining to this inquiry.

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