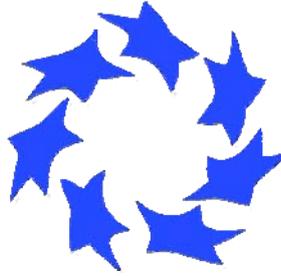


# SevenStar Electronics



Unit 7, Richards Close  
Wootton Bassett  
Wiltshire SN4 7LE  
United Kingdom  
(+44) (0) 1793 852829

Email: [info@sevenstarelectronics.com](mailto:info@sevenstarelectronics.com)

Web: [www.sevenstarelectronics.com](http://www.sevenstarelectronics.com)

4<sup>th</sup> July 2007

Commission's Secretary, Office of the Secretary  
**Federal Communications Commission**  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554  
USA

Reference: WT Docket No. **04-344**, Amendment of the Commission's rules regarding AIS Equipment to include Class B (CS) Transponders

Dear Sirs

SevenStar Electronics Ltd of the UK respectfully submits these comments in response to your Public Notice **DA 07-2597**.

SevenStar Electronics Ltd supports the waiver of the Pt 80 rules in order to allow the authorization of Class B AIS devices that *have been shown to meet the IEC-62287-1 International Standard*. Such units should have *received certification to this standard*, and should also have been *approved by the USCG*, before being considered by the FCC. SevenStar also recognises and emphasises the importance of accurately completing the static information and MMSI.

We believe that it is in the interests of public safety to allow this waiver rather than waiting further for the end of the rule making process. Lives are being lost every day through simple collisions and navigational errors, and the more widespread, controlled use of AIS technology will help to reduce these tragedies. As with all new things, the public sector needs to get experience with new technologies and devices in order to reap the benefits.

SevenStar Electronics Ltd is a manufacturer of professional electronic equipment for the marine market, and has already received EU and USCG approval for its SeaTraceR S.287 Class B AIS Transponder. SevenStar also manufactures GMDSS equipment (the S.701 SART is FCC approved as well as EU 'Wheelmark' approved), and is audited annually by Bureau Veritas. SevenStar is approved to ISO9001:2000, and is a member of RTCM.

Yours faithfully

Colin R. Watts  
Managing Director  
SevenStar Electronics Ltd