

ACCEPTED/FILED

13-99

APR 30 2013

Federal Communications Commission
Office of the Secretary



Federal Communications Commission,
PO Box 979097, St Louis, MD 63197-900,
United States of America.

RECEIVED & INSPECTED

MAR 04 2013

FCC-GBG MAILROOM

Dear Sirs

Supplement to Waiver Grantee Code AU9YFG

We refer to the letter of Waiver concerning the MOB device Sea Marshall type AU9 to be attached to survival life support garments.

Date of Grant May 10th 2010.

The waiver included a design provision "... additionally includes the ability to transmit the identity of the device with provision to include the transmission of the MOB GPS position."

The most suitable means of delivering the MOB identity and MOB GPS position uses the maritime Automatic Identification System (AIS), so this can be displayed on existing AIS-enabled chart-plotters. The provision of these facilities together with the existing 121.5 MHz alerting and homing function, improves survivor recovery in a managed rescue scenario.

MOB identity and MOB GPS are transmitted on AIS 1 & 2 (161.975 & 162.025 MHz) in the maritime VHF band at 500 mW ERP (equivalent to 820 mW EIRP). Modulation is Gaussian minimum shift keying at 9600 bps with Self-Organizing TDMA access to channel as defined in ITU-R M.1371-4.

The provision of this additional AIS position and identity transmission is secondary to 121.50 MHz as permitted under the waiver granted MAY 10 2010. The purpose is to provide an upgrade of an existing device to include information that further enhances the rapid location, identity and rescue of survivors, thereby minimizing search time.

We thank you for your time and attention to this request.

Yours truly,

David Marshall (Chairman) Marine Rescue Technologies Ltd

05/02/2013

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List ABCDE

Marine Rescue Technologies Limited

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Maritime Survivor Locating Devices

- 'SOS' Man Over Board Alert & Locate Systems
- 'SOS' Lost Diver Alert & Locate Systems
- 'SOS' Submariner Escape Alert & Locate Systems



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Federal Communications Commission,
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St Louis, MO 63197-9000
United States of America.

GRANTED
FOR THE REASONS INDICATED BELOW

A handwritten signature in black ink, appearing to be 'S. H. H.', is written over a horizontal line.

MAY 10, 2010

WAIVER- EXPEDITED ACTION REQUESTED

3rd March 2010

Dear Sirs,

We are seeking a waiver for a new upgraded version of the man over board device Sea Marshall SMRS8 grantee coded NWGSMRS8. The device designated Sea Marshall AU9 has been introduced to comply with latest R&TTE Directive Articles 3.2 and 3.3 by compliance with ETSI norms EN 300 152-2 (Article 3.2-protection of radio spectrum), and EN 300 152-3. (Article 3.3c – access to emergency services). The AU9 is compliant with new UK Civil Aviation Authority (CAA) requirements for "Helicopter Transit" and has been demonstrated to comply with EUROCAE ED14F.

The Sea Marshall AU9 is a replacement for the previous device designated Sea Marshall SMRS8 within the scope RTCM MSLD's RTCM SC-119, for which the FCC previous granted a waiver in 1998. The AU9 is recognized as a valuable aid to rescue providing immediate warning of Man Over Board (MOB) situations in the workplace in compliance with Oil & Gas and commercial vessel operators safety cover. The AU9 is designed to be able meet Commercial operator's safety case standards additionally includes the ability to transmit the identity of the device, with provision to include the transmission of the MOB GPS position.

The Sea Marshall AU9 device differs from RTCM and COSPAS/SARSAT Standards referenced in Part 95, subpart K. Sec. 95.1400 Basis & Purpose Compliant as shown in previous paragraphs of this

waiver request. Sec. 95.1401 **Frequency** The AU9 transmits on 121.50 MHz emission type A1D and is limited to transmission of d.3HEDS tones as specified by ITU-R-M690-1. Transmit emission level 100mW ERPEP maximum. The device does not transmit on 406MHz.

Sec. 95.1402 **Special requirements;** (a) noncompliant. (b) Part Compliant to RTCM 121.50 MHz except that does not transmit a 406 MHz signal or include the morse code letter "P" on its 121.50 transmission. (c) Noncompliant. (d) Informative only. (e) Noncompliant. (f) Noncompliant. (g) Noncompliant.

We seek a waiver request for all parts 95 1402. Including labeling. The labeling will clearly show manufacturer, equipment identifier, serial number unit identity, date of manufacture, FCC identifier mark (when granted) battery date. Emission type/ frequency. All operational instructions will be clearly indicated on non removable labeling in accordance with established industry standards.

We include with this Waiver request FCC form 159 and payment of \$175.00 fee code PDMW. ^{*} ~~BY~~ ^{*} cc

Thank you for your time and attention to our request.

Yours truly,



David Marshall (Chairman)

Marine Rescue Technologies Ltd

Terry Rowson

From: James Shaffer [James.Shaffer@fcc.gov]
Sent: 27 February 2013 20:31
To: 'Terry Rowson'
Subject: RE: FCC AU9AIS Waiver

Terry,
Please resubmit your waiver request and form 159, to the attention of Melissa Hower at FCC, 1270 Fairfield Rd., Gettysburg, PA 17325.

Regards,

Jim Shaffer (202) 418-0687

From: Terry Rowson [mailto:terryr@mrtsos.com]
Sent: Tuesday, February 26, 2013 11:25 AM
To: James Shaffer
Subject: FW: FCC AU9AIS Waiver

Hi James

Would it be feasible for you to forward the attached 159 with waiver to avoid any further miss directions and delays in getting this in the system?

Regards

.....
Terry Rowson
Operations Manager

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