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Standard Communications Pty. Ltd., trading as GME, respectfully submits these Comments in response to Docket WT 14-36 inviting comment regarding Rule Makings 11540, 11563, and 11667. Our specific concerns and comments relate in the main to the "Grandfathering" element of the proposals.

Emergency Position Indicating Radio Beacons (EPIRBs) – GME generally supports incorporation by reference of RTCM Standard 11000.3 for 406 MHz Satellite Emergency Position-Indicating Radio Beacons (EPIRBs) as a basis for certification of satellite EPIRBs noting that this revision effectively implements the recommendation of the National Transportation Safety Board (NTSB) for incorporation of a GNSS device. We also note that EPIRBs certified to the currently referenced RTCM standard, RTCM Paper 77–02/SC110–STD, when equipped with a GNSS device, effectively implement the recommendation of the National Transportation Safety Board (NTSB).

However, we propose that no new certifications to RTCM Paper 77–02/SC110–STD for EPIRBs that DO NOT incorporate a GNSS device be accepted one year after the publication date of the final rule and that no new certifications to RTCM Paper 77–02/SC110–STD for EPIRBS that DO incorporate a GNSS device be accepted **three years** after the publication date of the final rule. We propose that manufacture, sale, and importation of EPIRBs certified to RTCM Paper 77–02/SC110–STD be prohibited **five years** after the date of publication of the final rule. We further believe that there is no need to prohibit the continued use of EPIRBs certified to RTCM Paper 77–02/SC110–STD.

In support of this proposal we note;
Reviewing the changes between the currently referenced RTCM standard and the proposed referenced standard reveals the primary technical differences are the compulsory incorporation of GNSS device with its associated operational performance/test scenarios, new ergonomic requirements and an alignment in some areas with IEC 61097-2. The GNSS test scenarios were devised to ensure the "quality" of the GNSS device. GME suggests that technological improvements and competition within the GNSS device market effectively ensures the quality of available devices and new designs certified to the currently referenced standard incorporating a GNSS device will perform to the same level as a device certified to the proposed standard.

The proposed RTCM standard, RTCM 11000.3, was finalized in 2012 however with no certainty when or if it would be referenced within the rules manufacturers have been forced to make a decision whether to design to this standard under waiver or to the currently referenced standard. The only guaranteed path was to design to the latter.

EPIRB development programs typically take up to 2 years to produce and test a product at one of a limited number of approved test laboratories prior to submission

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to the COSPAS SARSAT Secretariat for approval and TAC issuance. The COSPAS-SARSAT audit/approval process invariably takes 1 year or more to complete.

Given the protracted beacon product development/testing/approval cycle, GME contends that without reasonable PLB and EPIRB grandfathering periods, the situation has the potential to severely disadvantage all beacon manufacturers currently participating in the US market place. It is also quite possible end users could be faced with a severely limited choice of beacons or in a worst case scenario experience a transitory monopoly/duopoly in favor of one or two manufacturers.

Finally we offer a comment on the financial implications of this NPRM. Notwithstanding the potential R & D write-off for work in progress, the cost of redevelopment, submission to an authorised test laboratory would be between $US400, 000 and $US600, 000. In commercial reality these costs would need to be amortized over the new models, thus inflating the end user price.