



June 2, 2014

Before the Federal Communications Commission

Washington, D. C.

In the Matter of)	
)	
Amendment of the Commission's Rules)	WT Docket No. 14-36
Regarding Maritime Radio Equipment and)	
Related Matters)	
)	
Petition to Request that FCC Amend the)	RM-11540
Rules to Permit the Use of Maritime VHF)	
Portable Radios Ashore Near Areas of)	
Maritime and Boating Activity)	
)	
Petition for Rulemaking to Amend Part 80 of)	RM-11563
the Commission's Rules to Provide for a)	
Digital Small Message Service on Certain)	
Maritime VHF Channels)	
)	
Petition to Amend Part 95 of the)	RM-11667
Commission's Rules to Provide for Certain)	
Personal Radio Service Devices)	
)	
Notice of proposed rulemaking)	1 April 2014

COMMENTS OF ACR ELECTRONICS, INC.

ACR Electronics, Inc. (ACR) respectfully submits these Comments in response to the notice of proposed rulemaking (NPRM) published in the Federal Register on April 1, 2014 (79 FR 18249). ACR generally supports the proposed rules with certain exceptions as explained herein.

Emergency Position Indicating Radio Beacons (EPIRBs) - ACR supports incorporation by reference of RTCM Standard 11000.3 for 406 MHz Satellite Emergency Position-Indicating

Radiobeacons (EPIRBs) as the basis for certification of satellite EPIRBs. This revision will effectively implement the recommendation of the National Transportation Safety Board (NTSB).

ACR has already responded to the NTSB recommendation and ceased selling versions of its range of 406 MHz EPIRBs without an integral GPS receiver earlier this year. In addition ACR has reduced the prices of its EPIRBs with integral GPS receivers to the prices of its withdrawn versions without GPS. As a result the NTSB estimate of \$100 additional cost of an EPIRB with integral GPS is no longer the case and there would no longer appear to be a cost penalty to mandating EPIRBs with integral GPS receivers

We propose that new certifications of EPIRBs to RTCM 11000.3 be accepted on the date of publication of the final rule. In fact, we urge the Commission to accept certifications to RTCM 11000.3 now, if requested by a manufacturer such as ACR. EPIRBs manufactured to meet RTCM 11000.3 will also meet RTCM Paper 77-02/SC110-STD (the current standard incorporated by reference) in every respect. ACR would propose that no new certifications to RTCM Paper 77-02/SC110-STD be accepted one year after the publication date of the final rule. Due to the benefits of integral GPS receivers in speeding up rescue operations and the benefits that RTCM 11000.3 should provide in terms of helping to reduce false alerts we would also propose that manufacture, sale, and importation of EPIRBs certified to RTCM Paper 77-02/SC110-STD be prohibited two years after the date of publication of the final rule. We believe that there is no need to prohibit the continued use of EPIRBs certified to RTCM Paper 77-02/SC110-STD, on the basis that most boat owners replace their EPIRBs at the battery replacement date, which is typically 5 years after the date of sale of the EPIRB.

Personal Locator Beacons (PLB) – ACR supports incorporation by reference of PLB standard RTCM 11010.2 with Amendments 1 and 2 as the basis for certification of PLBs. We propose that new certifications of PLBs to RTCM 11010.2 with Amendments 1 and 2, be accepted on the date of publication of the final rule. In fact, we urge the Commission to accept certifications to RTCM 11010.2 with Amendments 1 and 2 now, if requested by a manufacturer, such as ACR. PLBs manufactured to meet RTCM 11010.2 with Amendments 1 and 2 will also meet RTCM Paper 76-2002/SC110-STD (the current standard incorporated by reference) in every respect.

ACR proposes that no new certifications to RTCM Paper 76-2002/SC110-STD be accepted one year after the publication date of the final rule. We propose that manufacture, sale, and importation of PLBs certified to RTCM Paper 76-2002/SC110-STD be prohibited two years after the date of publication of the final rule. We believe that there is no need to prohibit the continued use of PLBs certified to RTCM Paper 76-2002/SC110-STD, on the basis that almost every PLB on sale in the USA already incorporates an integral GPS receiver.

Paragraph (b) of §95.1402 may be removed since it duplicates provisions in RTCM 11010. In place of the present paragraph (b), we suggest adding a specific prohibition on the use of “Personal Locator Beacon” or “PLB” for any device which does not meet § 95.1402. A few years ago, the Commission had to direct the manufacturer of a device we now call a Satellite Emergency Notification Device (SEND), not to call it a PLB.

In paragraphs (e) and (f) of §95.1402, the present preferred method of beacon registration is online at <http://www.beaconregistration.noaa.gov/>, and this should be clearly indicated. Please note that the postal address for Sarsat Beacon Registration has changed. It is now “SARSAT Beacon Registration, NOAA, NSOF E/SPO53, 1315 East-West Highway, Silver Spring, MD 20910.” On May 1, 2014 at the annual SARSAT Beacon Manufacturers Workshop, NOAA announced that mail sent to the old address will be returned after August 30th, 2014. This address change also affects paragraphs (e) and (f) of §80.1061, Special requirements for 406.0-406.1 MHz EPIRB stations and paragraphs (e) and (f) of §87.199, Special requirements for 406.0-406.1 MHz ELTs. The Presentation by NOAA also encourages Beacon Manufacturers to “Promote online registration to increase the likelihood of the owner registering a beacon” and indicates that new beacon registrations for the prior 12 month period beginning March 2014 averaged over 75% online verses fax and mail. Paragraph (f) of §95.1402, paragraph (f) of §80.1061, and paragraph (f) of §87.199 require the mailing address to be labeled on the exterior of the beacon. We believe that NOAA’s mailing address should be removed from the beacon labeling requirement and replaced with the online registration address to further promote usage of online beacon registration. Suggested copy for this change would be “The owner of this 406 MHz Beacon must register the UIN code contained on this label with the National Oceanic and

Atmospheric Administration (NOAA) whose web address is: www.beaconregistration.noaa.gov
.”

Satellite Emergency Notification Devices (SENDs) – ACR fully understands that SEND devices can already be authorized under Part 25. However ACR believes that any device specifically designed to be used in remote locations under often arduous conditions to seek assistance during situations of grave and imminent danger as is the case with SEND devices requires a more stringent authorization process. The important aspects of RTCM 12800 relate to how SENDs are used, their environmental durability and reliability, and how SEND service providers respond to emergency messages and relay them to SAR responders. SEND users and responders expect them to perform in a manner similar to PLBs and as such these devices should be subject to compliance with a rigorous standard designed to help ensure that these devices will work when needed. Unfortunately in our opinion authorization under the current Part 25 requirements will not ensure this, whereas requiring authorization to RTCM 12800 will help to ensure that these devices are fit for purpose.

Further ACR would propose that RTCM 12800 be made mandatory for all satellite communications devices outside of the 406.0 to 406.1 MHz band that provide emergency distress notification functions, with the exception of mobile satellite service devices that offer real-time, two way switched voice service that is interconnected with the public switched telephone network, in order to ensure that the general public can rely upon these devices in an emergency.

In addition ACR believes that all safety of life devices such as EPIRBs, PLBs, SENDs and MSLDs should prior to submitting a certification application be subjected to the environmental and operational tests associated with the test procedures described in the relevant RTCM Standard by a test facility accepted by the U.S. Coast Guard for this purpose. After the device has been certified by the recognized test facilities copies of the test report and test data obtained from the test facility recognized by the U.S. Coast Guard should be submitted to the U.S Coast Guard along with Instruction manuals and Product Labels for the device. The U.S. Coast Guard should be requested to review all this information for compliance with the relevant RTCM

standards and if compliant issue a letter to this effect. Certification applications submitted to the Commission should require a copy of the U.S. Coast Guard letter that states that the device satisfies all relevant RTCM standards.

Maritime Survivor Locating Devices (MSLDs) – ACR supports the inclusion of rules for certification of MSLDs based on RTCM 11901 in Part 95 of Title 47. We would have no objection to these rules being placed in Part 80 if preferred by the Commission.

ACR supports coordination with the Coast Guard for MSLD equipment certification as explained above for SEND devices on the grounds that these devices are intended to provide the location of persons falling overboard.

Automatic Identification System Search and Rescue Transmitters (AIS-SARTs) – ACR concurs with the intent of the revisions proposed to incorporate AIS-SARTs into the rules.

Portable Marine VHF Radios on Shore – ACR supports the use of portable marine VHF radios associated with a ship station that are used ashore near the waterline (e.g. from a dockside or beach) to communicate with vessels at sea.

The Commission asks why these communication needs cannot be met by CMRS or PRS options. Firstly many ships might not carry this equipment, whereas they are likely to have marine VHF radios on board designed for use at sea. Portable radios are nearly always waterproof nowadays and thus are well suited for use on small boats and from the dockside where they might be dropped in the water. The point is thus that simply stepping from a boat onto shore should not suddenly prohibited the use of the radio for maritime communications.

Sincerely,



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About ACR Electronics, Inc.

ACR designs and manufactures a complete line of safety and survival products under the ARTEX and ACR brand names including Emergency Locator Transmitters (ELTs), Emergency Position Indicating Radio Beacons (EPIRBs), Personal Locator Beacons (PLBs), Search and Rescue Transponders (SARTs), Strobe Lights, Life Jacket Lights, Search Lights and safety gear. The quality management systems of this facility have been certified by TUV USA to AS9100C / ISO 9001:2008. Recognized as the world leader in safety and survival technologies, ACR and ARTEX have provided safety equipment to the aviation, outdoors and marine industries as well as to the military since 1956. The company is headquartered in Fort Lauderdale, Florida in the United States and employs over 180 at its manufacturing facility and others around the world.