

TRANSMITTAL LETTER

FCC ID : KLS-MCM330

Overview

McMurdo Ltd hereby apply for a class 2 permissive change to equipment which has already been type accepted under the above FCC ID. We wish to make a slight change to type of cell used in the battery pack. Although this change slightly reduces performance, testing has shown that the equipment does still meet FCC requirements.

Proposed modification

The McMurdo MCM330 (FCC ID above) is a 121.5/243MHz class B EPIRB that uses a battery pack based on 3 SAFT type LSH14 cells. These are high rate Lithium Thionyl Chloride cells, which SAFT say cannot be classified as non-hazardous under Lithium transportation regulations. Having non-hazardous status is highly desirable and can be achieved with SAFT type LS26500 cells, which are SAFT standard rate Lithium Thionyl Chloride cells. The proposed modification is simply to replace the 3 off LSH14 cells with 3 off LS26500 cells. Cell wiring etc. remains unchanged. No other modifications are made.

Revalidation of performance

Since the cell chemistry (Thionyl Chloride) is unchanged, the running voltage is identical to the original at 10.5V nominal. After discussion with FCC labs the proposed re-validation exercise includes a repeat of the 48 hour operation test 2.1509 (e), but measuring only fundamental ERP. Plus in addition a battery discharge curve is provided to support our response to 80.1053 (e). All other parameters remain unchanged.