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Federal Communications Commission  
P. O. Box 979097  
St. Louis, MO 63197-9000

**WAIVER -- EXPEDITED ACTION REQUESTED****Request for waiver of rules governing equipment certification****Kannad Marine Safelink R10 (KLS-Z501)****McMurdo Smartfind S10 (KLS-Z502)**

Dear Office of Engineering and Technology

McMurdo Limited has developed two new products which can be described as marine Personal AIS Beacons to assist in survivor-in-the-water recovery operations.

KDB Inquiry to FCC (tracking Number 525032) requested advice on the appropriate route to FCC certification for these products.

Enclosed with this letter are copies of our original KDB Inquiry, and our reply to the first Response, and the final Response from Jim Shaffer of the FCC Wireless Telecommunications Bureau.

We are advised by your Jim Shaffer that we must request a waiver of Rule 47 CFR 80.1101 on Performance Standards, specifically clause (c)(6) on 9 GHz Radar Transponders, which you have identified as the closest equivalent item.

Our products are described in some detail in our 'General Description' document also enclosed, and previously supplied with our KDB Inquiry.

We submit that the underlying purpose of the above Rule, to guarantee that Search And Rescue Locating Devices are competent, is no longer served by limiting such devices to the category of 9 GHz Radar Transponders, in particular since IMO has made provision for such devices to include AIS-SARTs.

We further submit that it is in the public interest to allow products which implement the function of AIS-SARTs in packages small enough to be worn by the user, making very effective Personal AIS Beacons which can be used to aid survivor recovery, also referred to as 'man overboard' devices.

We propose that such beacons can make a significant contribution to safety of life in the many situations where a person may be at risk of falling into the water, while posing little risk of causing noticeable interference to other users of the radio spectrum, due to the nature of the AIS system itself and due to the fact that such beacons would only transmit when activated, i.e. in situations of risk to human life.

Therefore we request that the Commission waive its rules to allow these products.

Our REMITTANCE ADVICE Form 159 is enclosed.

Yours faithfully

A handwritten signature in black ink, appearing to be 'N. Jordan', with a large, stylized flourish at the end.

Neil Jordan  
Engineering Manager  
11 July 2011

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