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-----Original Message-----

From: Tim Harrington [<mailto:Tim.Harrington@fcc.gov>]

Sent: Wednesday, March 26, 2008 12:52 AM

To: Gert Bresemann (GB); Morten becker Saul (MBS); Finn Berthelsen (FB)

Cc: Tim Harrington; Joe Dichoso

Subject: RE: No FCC certification of Inmarsat Land Mobile equipment

remarks:

A) alloc. and rule parts 47 CFR 2.106

1626.5-1660 25, 80, 87

1660-1660.5 25, 87

B) part 25 for "explorer 727"

- 25.102(a) requires FCC authorization for operation of earth station equipment, where "authorization" is as specified per applicable provisions of "GENERAL APPLICATION FILING REQUIREMENTS" secs. 25.110-25.129 and cross-references therein

- by letter of 25.129, this vehicle-mounted voice/data BGAN transceiver does not appear to be a portable device, therefore would not require part 2 subpart J Certification

- however, pursuant to FCC-03-283 that inserted 25.129 in place of former 25.200, FCC OET Lab does permit processing of Certification applications for mobile earth-station transceivers designed for operation by end-users of satellite communication services, which would include e.g. BGAN devices ([http://www.inmarsat.com/Downloads/English/BGAN/Collateral/BGAN\\_Terminal\\_Comparison\\_EN.pdf?language=EN&textonly=False](http://www.inmarsat.com/Downloads/English/BGAN/Collateral/BGAN_Terminal_Comparison_EN.pdf?language=EN&textonly=False))

- part 25 rules are prepared and maintained by FCC International Bureau

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(1B), whereas parts 80 & 87 are prepared and maintained by FCC Wireless Telecommunications Bureau (WTB), therefore may not necessarily apply corresponding provisions such as 80.203(g) across all parts  
- for other part 25 devices [except 25.149(c)], not otherwise stating that part 2 subpart J Certification is required means that it is not required

C1) Portable transceivers : Certification is required by § 25.129  
> yes

C2) Non-portable vehicle transceivers. That is transceivers for installation in a car or a truck. By § ????  
> see remarks at B)

C3) Non-portable maritime transceivers. Still by § 80.203 or ??  
> as noted in FCC-03-283 para. 37-38 and footnote(s), those parts 80 &  
> 87 rules remain applicable for devices intended to operate under part  
> 80 or 87 license

C4) Non-portable aeronautical transceivers. Still by § 87.145 ??  
> at quick look I see no distinction for different types of station  
> equipment under part 87 Certif. requirement

C5) Note : We talk about the user end of the communication link and we talk about Inmarsat transceivers and MF/HF, VHF and UHF transceivers.  
> for MF/HF, VHF and UHF transceivers, Certif. is per applicable rule  
> intended for licensing (specific freq. allocation etc)

-----Original Message-----

From: Morten becker Saul (MBS) [<mailto:MBS@thrane.com>]  
Sent: Tuesday, March 25, 2008 10:51 AM  
To: Tim Harrington; Gert Bresemann (GB)  
Cc: Finn Berthelsen (FB); Joe Dichoso  
Subject: RE: Response to Inquiry to FCC (Tracking Number 400623)

<< File: EXPLORER%20727%20Media%20pdf.pdf >> << File:  
EXPLORER%20727%20Commercial%20pdf.pdf >> << File:  
EXPLORER%20727%20Defence%20pdf.pdf >> << File:  
EXPLORER%20727%20Fact%20Sheet%20pdf.pdf >>

Hi Tim

Great talking to you a moment ago..  
Attached are information of the Inmarsat Satellite terminal "Explorer 727"

I hope this will give you information of what kind of product the Inmarsat Terminal is.

Please don't hesitate to contact me, if you have any questions...

Med Venlig Hilsen/ Kind Regards  
Morten Becker  
Responsible of Regulatory Engineering  
T + 45 39 55 82 09  
E [mbs@thrane.com](mailto:mbs@thrane.com)  
Thrane & Thrane A/S - Lundtoftegaardsvej 93D DK-2800 Kgs. Lyngby, Denmark -

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-----Original Message-----

From: Gert Bresemann (GB) [<mailto:GB@thrane.com>]

Sent: Tuesday, February 19, 2008 5:30 AM

To: Tim Harrington

Cc: Morten becker Saul (MBS); Finn Berthelsen (FB)

Subject: FW: No FCC certification of Inmarsat Land Mobile equipment

<< File: FCC-03-283A1\_gmpcs.pdf >>

<< File: DOC-224026A1\_erratum\_FCC-02-134\_DA-02-1578.pdf >>

Dear Tim Harrington,

Thank you for the attached documents. I must say I am some confused by the FCC-03-283 document, because :

Paragraph 18 talk about certification requirement for each-station transmitters installed in ships and aircraft with a reference to 47 CFR §80.203 and §87.145.

§80.203 require certification for maritime tranceivers - except for Inmarsat tranceivers

§87.145 require certification for aeronautical tranceivers.

And very important. These 2 §'s have not been changed. See FCC-03-283 change section and FCC homepage for valid regulations.

FCC-03-293 paragraph 34 and 38 say: propose to exempt terminals permanently installed on ships, boats and planes. But again, I cant see that §80.203 and §87.145 have been changed.

So what I need is a link to valid regulation requirement for FCC certification or exemption for the certification requirement.

I need that for the following equipment types:

Portable tranceivers : Certification is required by § 25.129

Non-portable vehicle tranceivers. That is tranceivers for installation in a car or a truck. By § ????

Non-portable maritime tranceivers. Still by § 80.203 or ??

Non-portable aeronautical trancieivers. Still by § 87.145 ??

Note : We talk about the user end of the communication link and we talk about Inmarsat tranceivers and MF/HF , VHF and UHF tranceivers.

Hope you can help me to get a better understanding of FCC requirement.

Med venlig hilsen/Best Regards

QA Director

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-----Original Message-----

From: Tim Harrington [<mailto:Tim.Harrington@fcc.gov>]

Sent: Monday, January 14, 2008 9:40 PM

To: Gert Bresemann (GB)

Cc: Morten becker Saul (MBS); Tim Harrington

Subject: RE: No FCC certification of Inmarsat Land Mobile equipment

Hello Colleagues

please have a look in FCC-03-283, i.e. para. 29 etc. and let me know which sections most apply to your device

meanwhile I will look around and ask around and see what else there is about this topic

Best Regards

Tim Harrington

FCC/OET/Lab/EAB

From: Gert Bresemann (GB) [<mailto:GB@thrane.com>]

Sent: Thursday, January 10, 2008 10:45 AM

To: Tim Harrington

Cc: Morten becker Saul (MBS)

Subject: No FCC certification of Inmarsat Land Mobile equipment

<thrane\_pt25\_FCC Statement 99-123145.pdf> Dear Mr Harrington My Name is Gert Bresemann and I'm QA director at Thrane & Thrane A/S in Denmark Thrane & Thane (T&T) Develops and manufacture Satellite transceivers for the Inmarsat Satellite system.

We are at the moment in the "National Certification" process of some new Transceivers and are using M.Flom in Chandler, Arizona as FCC-TestLab. M.Flom uses ATCB as TCB for review and for filling the Test report and documentation.

M.Flom has just been FCC-testing two devices for T&T.

1Pcs. Maritime Earth to Satellite Amplifier / Antenna, and 1 Pcs.

Transceiver used for both Land Mobile / Maritime. (Part 25) According to M.Floms Lab Director Mr Hoosam Bandukwala it is Not possible to obtain a FCC Grant (FCC Certification) on these products any more. Please see attached Email correspondence between you and Mr Ward from ATCB, Mr Bandukwala from M.Flom and Mr Morten Becker from T&T.

We understand the notice in this correspondence, but we can't find any statement in Part 25 explaining that Mobile Earth to satellite transceivers Not have to be FCC-certified. Please note that there already are a Non FCC certifying statement for Maritime Earth to satellite (INMARSAT) in Part 80.203 (g).

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From the statement in Part 80.203 it is possible for T&T to make a FCC statement when importing Maritime INMARSAT products. Please see this statement below It is very important for T&T to have such a statement both when importing to USA and for ship inspections. Before above statement we have several times had equipment stopped in US Customs because of no FCC-ID on our maritime Inmarsat equipment.

We are aware of that Part 25.129 is for portable equipment and Part 25.149 is for ATC equipment but cant find a Part for Land Mobile equipment that previous was covered by Part 25:200 T&T would therefore appreciate if you could either return with a Part 25 Number for Non FCC certifying Land Mobile INMARSAT products.

If such statement not are included in Part 25, then T&T would appreciate if you or an other person with authorization could make an official and signed FCC statement for these Mobile INMARSAT products and return it. "An Email with an attached pdf. file will be fine"

T&T would also know if the Non "FCC certifying" includes INMARSAT Part 87 products? If so please return with the same procedure as for the Part 25.

Thank you very much in advance

Med venlig hilsen/Best Regards

QA Director

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From: Hoosam Bandukwala [<mailto:hoosam@mflom.com>]

Sent: Tuesday, January 08, 2008 6:47 PM

To: Morten becker Saul (MBS)

Subject: FWD: FW: Part 25certification

<Pages from FCC-03-283A1\_gmpcs.pdf>

Hello Morten,

I got this email from our TCB. He was in touch with the FCC regarding your project and they had a response that came back from them with an attach docket.. Please look into this and we can discuss this further.

Best Regards

Hoosam Bandukwala

Lab Director

Sr. Engineer

BQB

Phone: (480) 926-3100

[www.flomlabs.com](http://www.flomlabs.com)

----- Forwarded Message -----

From: "Dward ATCB" <[dward@atcb.com](mailto:dward@atcb.com)> <<mailto:dward@atcb.com>>

To: "'Hoosam Bandukwala'" <[hoosam@mflom.com](mailto:hoosam@mflom.com)> <<mailto:hoosam@mflom.com>>

Date: Mon, 7 Jan 2008 15:10:48 -0800

Subject: FW: Part 25certification

HI Hoosam

Below is the email from the FCC on these type devices. Please note that in accordance with item 4 of the original reviewer comments in which it was stated "Please note that only portable handheld Part 25, Mobile ATC (terrestrial to terrestrial) part 25 devices require certification. All other transmitter under Part 25 do not require certification. Please note

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that this device does not appear to be either type but appears to operate in the earth to space band of 1626.5-1660.5 MHz. Please explain and please give proper justification as to why this device is subject to certification" proper justification cannot be found for certification of this device."

Please also find the FCC docket we discussed.  
Thanks

Dennis Ward  
Director of Engineering  
American TCB  
Certification Resource for the Wireless Industry [www.atcb.com](http://www.atcb.com) 703-847-4700  
fax 703-847-6888 direct - 703-880-4841

-----Original Message-----

From: Tim Harrington [<mailto:Tim.Harrington@fcc.gov>]  
<<mailto:Tim.Harrington@fcc.gov>>

Sent: 01/07/2008 11:46 AM

To: [dward@atcb.com](mailto:dward@atcb.com)

Cc: Tim Harrington; Joe Dichoso

Subject: RE: Part 25

Hi Dennis

- 25.200 was basis for "optional" certification (25.200 deleted by FCC-02-134)

- 25.200 was "superseded" by 25.129

- per discussions with FCC International Bureau in approx. jan07 to may07, and FCC-03-283 para. 29, OET/Lab will allow "optional" Certification not just for portable but also for Part 25 mobile earth-station transceivers designed for operation by end-users of satellite communication services

- per FCC-03-283 para. 29, Certification equipment authorization is not applicable (and therefore not optional) for mobile Part 25 network infrastructure transceivers, such as feeder-link transmitters and transmitters used for tracking and command uplinks

- like e.g. part 15 Verification-only devices, OET/Lab does not permit Certification when rules do not require it

Best Regards  
Tim Harrington  
FCC/OET/Lab/EAB

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From: Dward ATCB [<mailto:dward@atcb.com>]

Sent: 12/27/2007 6:45 PM

To: 'Joe Dichoso'; 'Rashmi Doshi'; 'George Chen'; 'Andrew Leimer'

Subject: Part 25

I have an applicant that is trying to certify an amplifier for use under part 25. The amp is only used for earth to satellite communication and is not an ATC (ancillary Terrestrial Component - terrestrial to terrestrial) device. In the past devices like these could be either certified or verified. However, if I remember correctly last year or so the FCC said they do not want these certified any longer and took out the either or approach. Is this still the case or can this device get a grant of equipment authorization under the certification process?

Thanks

Dennis Ward

Director of Engineering

American TCB

Certification Resource for the Wireless Industry [www.atcb.com](http://www.atcb.com) 703-847-4700

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