

# GRANTED

FOR THE REASONS INDICATED BELOW

*Grant Shaw 10/30/14*

Federal Communications Commission  
1270 Fairfield Rd  
Gettysburg, PA 17325-7245  
United States of America

Attn: James Shaffer

30<sup>th</sup> October 2014

Dear Mr Shaffer,

Ocean Signal Ltd. are planning to introduce a new Maritime Survivor Location Device (MSLD), the rescueME MOB1, in to the US market, to be approved under CFR47 part 95K, but operating to standards not yet incorporated into FCC rules. For this reason Ocean Signal hereby requests an expedited waiver of the rules to permit certification of the rescueME MOB1 under part 95K.

This device will operate on both AIS and DSC frequencies and comply with RTCM standard SC11901.1 to the extent described in detail below. This man overboard device is designed to be small enough to easily pack in a standard life jacket and will be automatically activated on inflation of the life jacket and will provide an important safety product to improve the chances of survival of persons falling overboard from their vessel.

It should be noted that the operation of this product is also compliant with the manner of operation described in relevant parts of ITU-R Report M.2285-0, particularly clauses 3.2.2 para. 1 and 2.

For reference, AIS MSLD devices for personal use have previously been permitted under waivers, DA 13-796 and DA12-80. DSC devices were also permitted under waiver DA-2113.

Ocean Signal Ltd will also apply for a letter of acceptance from the USCG, once the appropriate test reports are available.

Yours faithfully,

*David Sheekey*

David Sheekey  
Product and Approvals Manager



Unit 4  
Ocivan Way  
Margate  
Kent  
CT9 4NN

telephone  
+44 (0)1843 282930

email  
info@oceansignal.com

web  
www.oceansignal.com

Registration No  
6627101

VAT No  
938 4374 89

Registered Office  
27 New Dover Road  
Canterbury  
Kent  
CT1 3DN

## **Operation**

When the rescueME MOB1 is activated, either manually or automatically, it will start transmitting both AIS and DSC messages after a short delay, to allow for inadvertent activations to be manually cancelled by the user.

### **AIS transmissions.**

The AIS transmissions are fully compliant with RTCM SC11901.1 as indicated below.

#### ***Active Mode***

On activation the MOB1 will commence transmissions of AIS messages 1 and 14 in accordance with Annex 9 of ITU-R M.1371-5, coded with the self identification of 972 plus a 6 digit number containing the manufactures ID (Ocean Signal = 60) and the individual ID for that particular unit.

Message 1 (position report) will be transmitted with Navigational status set to 14. Message 14 (safety related broadcast message) will contain the text "MOB ACTIVE".

Messages will be transmitted on both AIS1 and AIS2 in accordance to the sequence defined in SC11901.1 E.3.8.1.1.

#### ***Test mode***

When a AIS transmission test is selected by the appropriate key press, the transmissions of message 1 and 14 are in accordance with RTCM SC11901-1 E.3.8.1.2, with the navigational status of message 1 set to 15, and the text of message 14 set to "MOB TEST".

## **DSC transmissions**

DSC transmissions are compliant with RTCM SC11901.1 as indicated below.

### ***Activation***

On activation the MOB1 will commence transmissions of an Individual Distress Relay message as described in SC11901.1 A.3.8. The message will be coded in accordance with ITU-R M.493-13 Table 4.3 with the Nature of Distress set to 110 (MOB). The Self-ID will be coded with 972 plus a 6 digit number containing the manufactures ID (60) and the individual ID. The destination address will be the MMSI of the own ship, which will have been previously programmed in to the MOB1 [by computer interface]. [The Distress MMSI will be set to 126 five times.]

After 30 minutes a DSC Group call coded in accordance with M.493-13 Table 4.8, and addressed to a previously entered group identity, as required by SC11901.1 clause 3.8. (If a group identity has not been entered, then this call will not be sent.) Following the transmission of the Group call, the cycle will start again until the unit is manually deactivated.

### ***Test Mode***

When a DSC Test transmission is selected by the appropriate key press, a single DSC test message is sent in the form defined in ITU-R M.493.13, Table 4.7.