

## David Sheekey

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**From:** Tim Maguire <Tim.Maguire@fcc.gov>  
**Sent:** 24 April 2017 18:41  
**To:** David Sheekey  
**Subject:** RE: Advice on re-certifying the MOB1 MSLD XYE-MOB1.

Hi David,

If the device is already certified, and the new testing is being done for submittal of a permissive change to the same FCC ID, only the new tests need to be done by an accredited lab. Any new device or any device being submitted under a new FCC ID must be tested with an accredited lab. I hope that helps.

Best regards,  
Tim

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**From:** David Sheekey [mailto:david.sheekey@oceansignal.com]  
**Sent:** Monday, April 24, 2017 10:38 AM  
**To:** Tim Maguire <Tim.Maguire@fcc.gov>  
**Subject:** RE: Advice on re-certifying the MOB1 MSLD XYE-MOB1.

Tim,

Sorry, but I do not think that this does answer the question! The reason for this is that the new test in part 95.1403 states that "(e) Before an MSLD certification application is submitted, the applicant must obtain a test report from a test laboratory which shows that the MSLD complies with the electrical and environmental standards associated with RTCM 11901. The test laboratory must be accredited to ISO/IEC 17025 with a scope covering the applicable requirements and test procedures."

As MSLDs are certified, any new tests for environmental etc., not covered by previous testing will need to be repeated in an accredited test house to comply. But do the tests in the current test report that the device was certified against need repeating at an accredited test house?

### David Sheekey Products & Approval Manager

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**From:** Tim Maguire [<mailto:Tim.Maguire@fcc.gov>]  
**Sent:** 19 April 2017 14:59  
**To:** David Sheekey  
**Subject:** RE: Advice on re-certifying the MOB1 MSLD XYE-MOB1.

Hi David,

An accredited test house would only be required if a device needs to be Certified by the FCC. If the tests are only needed to verify compliance, there is no need to use a certified lab. Does that respond to your concern?

Best regards,

Tim Maguire  
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**From:** David Sheekey [<mailto:david.sheekey@oceansignal.com>]  
**Sent:** Thursday, March 16, 2017 1:15 PM  
**To:** Tim Maguire <[Tim.Maguire@fcc.gov](mailto:Tim.Maguire@fcc.gov)>  
**Subject:** Advice on re-certifying the MOB1 MSLD XYE-MOB1.

Tim,

We are considering the need to re-certify the rescueME MOB1, originally certified in accordance with the waiver attached.

The electrical and signalling tests carried out in accordance with the clauses stated in the waiver were carried out in our own factory test facility and accepted under the old testing rules in force at the time.

The recent publication of the changes to part 95k of 47CFR will require us to do additional testing for the environmental tests and other parts of RTCM SC11901.1 at an accredited test house. Will we be required to repeat the testing already assessed for certification by the TCB against the waiver? To do this at an accredited test house will involve a considerable cost which might have a knock on effect on the price of the product in the US market.

**David Sheekey**  
**Products & Approval Manager**

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