

January 3, 2000

FEDERAL COMMUNICATIONS COMMISSION
7435 Oakland Mills Road
Columbia, MD 21046

Attn: Mr. Franklin F. Coperich

Re: FCC ID: B668L2ACR SR-102

Dear Mr. Coperich,

Update to Type Acceptance certification to reflect current IMO resolutions is hereby requested for subject radio.

FCC rules for survival craft radio (80.1101) currently references IMO Resolution A.605(15). Our radio is currently type accepted under those rules. The IMO however, have superceded A.605(15) with the current resolution A.809(19) which includes some minor changes.

Attachment A hereto details each change from A.605(15) to A.809(19) along with our statement detailing radio compliance to each change.

The test data submitted previously for this radio demonstrates compliance of the radio to CFR 47 Part 2 and Part 80.1101 (GMDSS) performance standards including:

80.1101 (b) (1)
80.1101 (b) (6)
80.1101 (c) (7)

Attachment A hereto demonstrates compliance to the revised IMO standard.

I certify that the ACR / SR-103 (FCC ID B668L2ACR-SR-103) complies with all applicable requirements listed in CFR 47 Part 2, Part 80.1101 and the latest updates to IMO resolutions [A.809(19)].

While the USA does not specifically require IMO references on Type Acceptance Certificates, certain other administrations do, and we find our products at a disadvantage in the export market without the IMO references on our Type Acceptance Certificate.

Therefore, I am requesting reissue of Type Acceptance Certification for subject radio with GMDSS and IMO A.809(19) notation.

Regards,

ACR ELECTRONICS, INC.

John F. Flood
VP Engineering

JFF/man

Encl.

Attachment A
Test Plan / Report
Photographs
SR-102 Grant of Equipment Authorization

ATTACHMENT A

Compliance matrix for ACR SR-103 radio to IMO Resolution updates [IMO A.605(15) to A.809(19)].

Reference enclosed test plan & report for acceptance test details.

General

2.3.2 A.809 (19) - be capable of being operated by personnel wearing gloves as specified for immersion suits in regulation 33 of chapter III of the 1974 SOLAS Convention.

A.605 (15) - be capable of being operated by personnel wearing gloves

Each control button was operated while operator wore immersion suit glove (*see enclosed report*) - **Complies**

2.3.13 A.809 (19) - be capable of being operated by personnel wearing gloves as specified for immersion suits in regulation 33 of chapter III of the 1974 SOLAS Convention.

This is a new requirement. The radio is enclosed in a highly visible yellow case. (*see enclosed color photograph of radio*) - **Complies**

Environmental Condition

A.809 (19) - The equipment should be so designed as to operate over the temperature range -20°C to + 55°C. It should not be damaged in stowage throughout the temperature range -30°C to +70°C.

A.605 (15) - The equipment should be so designed as to operate over the temperature range -20°C to +55°C. It should not be damaged in stowage throughout the temperature range -30°C to +65°C.

The upper storage temperature range has been increased from +65°C to +70°C.

The radio was stored at +70°C for 24 hours and was then tested at ambient for function, and operating life (*see enclosed report*) - **Complies**

Power Supply

- 12.2 A.809 (19) - Equipment for which the source of energy is intended to be user-replaceable should be equipped with a non-replaceable seal to indicate that it has not been used.

This is a new requirement. The radio is supplied with a dedicated primary battery with a non-replaceable seal to indicate that it has not been used (*see enclosed photo of battery showing seal*) - **Complies**

- 12.3 A.809 (19) - Equipment for which the source of energy is intended to be non-user-replaceable should be provided with a primary battery. The portable two-way radiotelephone equipment should be fitted with a non-replaceable seal to indicate that it has not been used.
- A.605 (15) - The two-way radiotelephone equipment may be equipped with a primary or secondary battery. Primary batteries shall have a shelf life of at least 2 years.

This is a new requirement. The radio is fitted with a replaceable primary battery. Therefore this requirement does not apply. - **Complies**

- 12.5 A.809 (19) - Primary batteries should have a shelf life of at least two years, and if identified to be user-replaceable should be of a colour or marking as defined in 2.3.13.

This color requirement is new. The radio is fitted with a highly visible yellow primary battery (*see enclosed color photograph of radio*) - **Complies**

- 12.6 A.809 (19) - Batteries not intended for use in the event of a distress situation should be of a colour or marking such that they cannot be confused with batteries intended for such use.

This is a new requirement. The optional rechargeable batteries are clearly marked as NOT FOR GMDSS USE (*see enclosed color photograph of batteries*) - **Complies**