



**GRANTED** AS SUPPLEMENTED  
FOR REASONS INDICATED BELOW  
5/3/16  
*[Signature]* 5/10/16

Vesper Marine Ltd  
45 Sale Street  
PO Box 91164  
Auckland, 1142  
New Zealand  
Tel: +64 9 950 4848

November 4, 2015

Federal Communications Commission  
1270 Fairfield Rd  
Gettysburg, PA 17325-7245  
Attn: WTB-TSI Daniel McCleary

RECEIVED & INSPECTED

NOV 06 2015

FCC-GBG MAILROOM

### WAIVER – EXPEDITED ACTION REQUESTED

#### Request for waiver of rules governing equipment authorization

#### Vesper Marine Type 3 AIS Aid to Navigation (VAB1252)

Dear Sir/Madam,

Vesper Marine has developed a range of AIS Aid to Navigation (AtoN) products used to electronically mark hazards and points of interest on the water. Its latest product offering, the VAB1252 is a Type 3 AIS AtoN.

The USCG has reviewed the VAB1252 technical file as per Rule 33 CFR Part 66, and approved it as meeting the technical requirements as outlined in IEC 62320-2. USCG letter 2015-3421 dated Aug 18, 2015 is enclosed.

Normally AIS equipment must also meet FCC Rule 47 CFR Part 80. Class A and Class B AIS equipment is covered by this rule. However, there is currently no reference to AIS AtoNs in Part 80 and the international standard for AtoNs IEC 62320-2 is also not incorporated into the rule.

A KDB enquiry through TUV SUD BABT (tracking number 470228) and subsequent correspondence with Rashmi Doshi of the FCC Wireless Telecommunications Bureau confirmed the above and recommended we request a waiver of Rule 47 CFR Part 80 to permit equipment certification and 47 CFR Part 80.17(b), Administrative Classes of Stations, to permit licensing.