



Federal Communications Commission
Washington, D.C. 20554

April 17, 2007

DA 07-1728

ACR Electronics, Inc.
5757 Ravenswood Road
Fort Lauderdale, FL 33312-6645
Attn: John F. Flood

RE: Standard Communications Pty. Ltd. FCC ID TXJMT401-FF

Dear Mr. Flood:

This is in response to your letter on behalf of ACR Electronics, Inc. (ACR) that we received August 21, 2006.¹ ACR argues that the above-referenced emergency position indicating radiobeacon (EPIRB) manufactured by the GME Division of Standard Communications Pty. Ltd. (Standard Communications) does not comply with Section 80.1061(a) of the Commission's Rules² because it does not meet the technical requirements applicable to the equipment.³ The device was granted FCC certification on May 25, 2006. ACR asks that the Commission reexamine the equipment approval and consider stopping sales until the manufacturer provides corrective action.⁴ As set forth below, we conclude that the Standard Communications EPIRB complies with the relevant technical standards.

ACR argues that the Standard Communications EPIRB does not comply with the technical requirements that a distress alert be initiated only by a dedicated distress alert activator that is clearly indicated and protected against inadvertent operation, and that manual distress alert initiation require at least two independent actions.⁵ Specifically, ACR states that the Standard Communications EPIRB has a serious technical deficiency relating to the ON/Test activation switch mechanism because a single push button is used to initiate both a self-test and to manually activate the EPIRB: when the activation button is pushed for a short time, a self-test is performed; but when the button is pushed for a longer time, the EPIRB will transmit a live 406 MHz emergency message.⁶

While the Standard Communications EPIRB utilizes the same button for testing and activation, the user accesses the button differently in each case. To perform the monthly test, the user opens the

¹ Letter dated Aug. 16, 2006 from John F. Flood, Vice President, Engineering, ACR Electronics Inc. to Tim Maguire, Federal Communications Commission (Letter).

² See 47 C.F.R. § 80.1061(a).

³ See RTCM Paper 77-2002/SC110-STD, "RTCM Recommended Standards for 406 Emergency Position-Indicating Radiobeacons (EPIRBs), Version 2.1 dated June 20, 2002" (RTCM SC-110 STD).

⁴ See Letter at 2.

⁵ See RTCM SC-110 STD sections 2.3.1.1 and 2.3.1.2; see also RTCM SC-110 STD section 2.3.1.3, which states, "A separate test switch or switch position is required for this test function. The test switch (or similar control) should automatically return (for example, spring-loaded switch) from the test position."

⁶ See Letter at 1.

switch cover (marked “LIFT”), then pushes and releases the activation button (marked “TEST”). To initiate a distress alert, the user opens the switch cover, then moves a slider (marked “ON”) over the activation button to hold the button down.

We conclude that the Standard Communications EPIRB complies with the relevant technical standards. The use of the slider for manual distress alert initiation satisfies the requirement for a dedicated distress alert activator and a separate switch or switch position to activate the test function. Activation of the Standard Communications EPIRB is a distinct process from the monthly test procedure.⁷ We also note that the device requires two independent mechanical actions for manual activation of the EPIRB: opening the cover, and moving the slider. In addition, all controls are clearly and durably marked, and the device is designed to prevent inadvertent activation through the instructions provided along with the requirement to move the yellow slider for distress alert initiation.

Therefore, we conclude that the Standard Communications Pty., Ltd. EPIRB with FCC ID TXJMT401-FF meets the requirements of RTCM Paper 77-2002/SC110-STD and Section 80.1061(a) of the Commission’s Rules. We trust that this responds to your inquiry.

FEDERAL COMMUNICATIONS COMMISSION

Scot Stone
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⁷ While we recognize that the unit may be activated if the user presses the activation button indefinitely, the device clearly states that for testing the user should depress the button only momentarily.