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

Faenza, Jul 30<sup>th</sup>, 2015

Subject: Waiver request for W420 and W420EX MSLD

Our Ref: 300715A1 Attn: James Shaffer

Dear Mr Shaffer,

FOR THE REASONS INDICATED BELOW

Wamblee s.r.l. are planning to introduce a new Maritime Survivor Location Device (MSLD), the W420 and W420EX, 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 Wamblee hereby requests an expedited waiver of the rules to permit certification of the W420 and W420EX under part 95K.

The W420EX is identical to W420 except is ATEX (atmosphere explosive) compliance (special plastic case).

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

We propose that such beacons can make a significant contribution to safety of life in the many situations where a person may be at risk of falling into the water, as also demonstrated by the numerous requests of interest in the product in question.

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.

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

Yours faithfully,

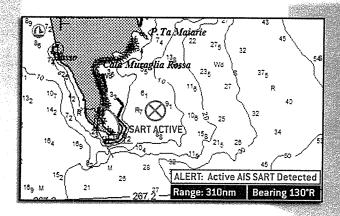
Daniele Banfi, CEO



W420 rescue device

## **ONEMANAIS SARTUNIT**

- HIGH-TECH AND RELIABLE
- LIGHT, COMPACT AND EASY TO WEAR
- SIMPLE TO USE
- HIGHLY-EFFICIENT LIGHTING SIGNAL **DESIGNED TO ENSURE IMPROVED LOCALISATION IN CONDITIONS OF POOR VISIBILITY**
- MANUAL AND AUTOMATIC ACTIVATION
- WORKING IN AIS MODE, WITH INTEGRATED GPS.
- PREPROGRAMMED UNIQUE ID.





## VV420

The new W420 "RESCUE-ME" is a compact personal safety device, designed to guarantee the safety of crew members. Applies easily to inflatable lifejacket through the removable bracket or using a textile hook.

Should the wearer fall overboard, the W420 starts working automatically thanks to the sea-sensors situated on the rear of the device and transmits a radio signal that can be used to locate the crew member.

The W420 is fitted with an activation/deactivation knob and a safety lock to avoid the device being accidentally activated. The device is also equipped with a high-performance light signal (LED) to aid localisation of the crew member during conditions of poor visibility, as well as a large Test or Manual Activation pushbutton.

To ensure the device is working properly and to check the battery level, the user needs to ensure that the activation knob

is in the OFF position before pressing the Test button. Out at sea and with the activation knob in the ARMED position, the user can press the push button to immediately send out the alarm signal should they fall overboard. The W420 sends a radio message on international maritime AIS channels 1 & 2, receivable by any AIS equipment on board or surrounding rescue units.

A sophisticated integrated GPS receiver provides the location of the crew member.

The batteries supplied with the device (three  $LiMnO_2$  3-volt batteries) have a guaranteed life of 5 years (in normal weather conditions) and can be replaced directly by the user. The W420 is an extremely easy to use device and thanks to the ergonomic design and the shape of its controls, can be easily activated, even if the user is wearing gloves and/or protective gear.

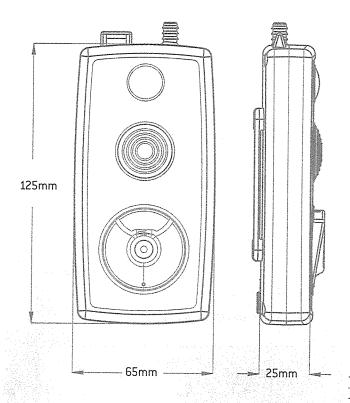
## TECHNICAL SPECIFICATIONS

- Emission VHF channels: AIS 1 & 2.
- Emission power: +33 dBm typical, +30 dBm minimum,
- Modulation: GMSK
- Messagge type: type 1 (GPS,UTC,SOG,COG,UID) and type 14 (SART ACTIVE or SART TEST).
- GPS update position every minute.
- Antenna: flexible wipe antenna with silicon-rubber protective sheath.
- Light signalling: 1 diode LED high-performance white light, 25mS flash repeated 20 times/minute.
- Light level: > 0.8 cd perpendicularly
- Working temperature: from -20°C to +55°C.
- Storage temperature: from -30°C to +70°C.
- · Activation: manual two stages / partially automatic
- $\bullet$  Power supply: 3 primary LiMnO<sub>2</sub> 2/3AA batteries (CR123), non hazardous.
- Battery life: replace every 5 years.\*
- Operations and controls: armed, manual activation, partially automatic, TEST function.
- Duration of operation (once activated): at least 24 hours.
- Size: 125 x 65 x 25 mm (L x W x H) (antenna excluded).
- · Weight: 140g.
- European Standards: R&TTE Directive 99/05/EEC, EN61097-14, EN61108 part 1,2 e 4, EN60945, ITU-R M.1371
- Warranty: 5 years 'WorldWide'.
- Available in ATEX II 3G IIC T6 version.

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\* in standard weather conditions (20°  $\pm$  5°, <= 60 %ur), with planned TEST cicles but without ever being activated.

Order code	Description	Packing quantity
P20015	W420 'RESCUE-ME' AIS SART 1	1



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