





Registro Imprese Ravenna no. 02276360399
Rea no. 187355
Albo Imprese Artigiane Ravenna no. 60939

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

Faenza, Jul 30th, 2015

Subject: Waiver request for W400 and W400EX MSLD

Our Ref: 300715A2 Attn: James Shaffer

Dear Mr Shaffer,

FOR THE REASONS INDICATED BELOW

We are seeking a waiver for a products (Wamblee W400 and W400EX) that we want to submit to FCC approval. The devices has been introduced to comply with latest R&TTE Directive Articles 3.2 and 3.3 by compliance with ETSI norms EN 300 152-2 (Article 3.2-protection of radio spectrum), and EN 300 152-3. (Article 3.3c – access to emergency services).

The W400EX is identical to W400 except is ATEx (atmosphere explosive) compliance (special plastic case).

The W400(EX) are recognized as a valuable aid to rescue providing immediate warning of Man Over Board (MOB) situations in the workplace in compliance with Oil & Gas and commercial vessel operators safety cover. The W400 is designed to be able meet Commercial operator's safety case standards, as also demonstrated by the numerous requests of interest in the product in question.

The Wamblee W400 device differs from RTCM and COSPAS/SARSAT Standards referenced in Part 95, subpart K. Sec. 95.1400 Basic & Purpose Compliant as show in previous paragraphs of this waiver request. Sec. 95.1401 Frequency The W400 transmits on 121.50 MHz emission type A3X and is limited to transmission of d.3HEDS tones as specified by ITU-R-M690-1. Transmit emission level 100mW ERPEP maximum. The device does not transmit on 406MHz. Sec. 95.1402 Special requirements; (a) noncompliant. (b) Part Compliant to RTCM 121.50 MHz except that does not transmit a 406 MHz signal or include the morse code letter "P" on its 121.50 transmission. (c) Noncompliant. (d) Informative only. (e) Noncompliant. (f) Noncompliant.

We seek a waiver request for all parts 95.1402 including labeling. The labeling will clearly show manufacturer, equipment identifier, serial number unit identity, date of manufacture, FCC identifier mark (when granted) , battery expire date, Emission type/frequency. All operational instructions will be clearly indicated on non removable labeling in accordance with established industry standards.

For reference, 121.5 MHz MSLD devices for personal use have previously been permitted under waivers, DA 98-2013A1.

Yours faithfully , Daniele Banfi, CEO