



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.