

2nd November 2004

For the attention of the Federal Communications Commissions, Office of Engineering and Technology exhibit examining Engineer.

Under the commission's rules, 47CFR80.373 states that

156.375 MHz and 156.650 MHz are available primarily for intership navigational communications. These frequencies are available between coast and ship on a secondary basis when used on or in the vicinity of locks or drawbridges. Normal output power must not exceed 1 watt. Maximum output power must not exceed 10 watts for coast stations or 25 watts for ship stations.

McMurdo Limited wish to state that the M-2 UIAS unit, which is offered for approval, has been designed and tested and type approved to the requirements specified in IEC 61993-2. This specification clearly states that UAIS VHF transmissions are inherently limited to 156.525MHz (DSC), 161.975MHz (AIS1) and 162.025MHz (AIS2).

McMurdo Limited wish to respectfully suggest that the only way the M-2 UAIS can be forced to transmit on other frequencies, is when it is commanded to do so by a shore basestation, (which is likely to be under the control of the United States Coast Guard).

Therefore, in the specific instance, the responsibility resides with the base station operator.

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