

May 11th, 2021

Mr. Jeff Tobias,
Chief, Mobility Division
Wireless Telecommunications Bureau,
Federal Communication Commission
445 12th St SW
Washington, DC 20554

Re: EMS Technologies Canada, Ltd. – Applicability and Conditions for Waiver of Part 87 Rules to Allow Equipment Certification of Aeronautical Mobile Satellite Service Transceiver (Small UAV SATCOM, Pending FCC ID K6KSMALLSATCOM)

Dear Mr. Tobias:

On the 20th November 2020, EMS Technologies Canada, Ltd. (“EMS”) a wholly owned subsidiary of Honeywell International Inc., pursuant to section 1.925 of the Commission’s rules, requested a waiver of Sections 87.131, 87.133, 87.137, 87.139(i)(1) and 87.141(j) of the Commission’s rules to permit certification of its next generation Aeronautical-Mobile Satellite Service (“AMSS”) transceiver, Small UAV SATCOM. The transceiver supports the SwiftBroadband aircraft communications service for use with, but not solely confined to, unmanned aircraft e.g. drones, UAVs.

On the 7th May 2021, EMS received confirmation that the waiver request was accordingly **GRANTED** and sections 87.131, 87.133, 87.137, 87.139(i)(1) and 87.141(j) of the Commission’s rules are **WAIVED** as requested. No additional conditions were stated, and EMS considers the waiver valid for the duration of the product lifetime of the transceiver with the FCC ID K6KSMALLSATCOM.

The waiver is applicable to this product as it permits the certification of the company’s transceivers to support the Inmarsat SwiftBroadband aircraft communications services. Current Part 87 rules do not allow for the wider bandwidth, higher transmission speeds and more efficient modulation techniques of newer AMSS systems.

The Small SATCOM transceiver has been tested and found to meet the technical requirements of Part 87 AMSS rules with respect to output power, spurious emissions and intermodulation. With the grant of the above waiver, the conditions of both Part 87 of the Commission’s Rules and the granted waiver will be met for the duration of the product lifetime of the Small UAV SATCOM transceiver.

Sincerely,

Dennis Teske,

SR Director Engineering