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Ref: Expiration of ABS MED Certified Call points, FB Bell, CF Bell

Dear Sir / Madam,

The below gap analysis summarizes our position of the above products to comply with the latest Marine Equipment Directive requirements.

We are confident of the ability of our products to meet the additional requirements, and are in negotiations with our certification body, ABS, to issue updated certificates.

MED Testing to comply with the latest EN54-3, IEC 60092-504 and IEC 60533 editions (sounder and bells)

Test	Product / Industry Standard	Base / Test Standard	Additional Test requirements	Mitigation statement.
Synchronisation	EN54-3:2014	N/A	ΔT between 2 samples < 0.05s after 5, 10, 15 mins sounding	This is an optional requirement and is not feasible for bells, therefore not required.
Fast Transients	EN54-3:2014	EN 50130- 4:2011+A1 EN 61000-4-6	Repetition rate changed from 5kHz to 100kHz	The CF bells do not have any active electronic components within their architecture, and therefore there is no risk of the fast transients affecting the functionality. The FB Bell has a single active component which controls the oscillation of the solenoid, there is minimal risk of the fast transients affecting this function.
Radiated immunity	EN54-3:2014 IEC 60092- 504:2016	EN 50130- 4:2011+A1 EN 61000-4-3	Additional Test frequency range from 2GHz to 6GHz @ 10V/m.	The CF Bells do not have any active electronic components within their architecture, and therefore there is no risk of the radiated EMC affecting the functionality. The FB Bell has a single active component which controls the oscillation of the solenoid, there is minimal risk of the radiated EMC affecting this function.
Radiated Emissions	IEC 60092- 504:2016	CISPR 16-1-1 CISPR 16-2-1	Additional Test frequency range from 2GHz to 6GHz (emissions limit 54 dBµV/m)	For the Bells, the only emissions are from the motor or solenoid. There is negligible risk of the radiated EMC exceeding the acceptable threshold.

MED Testing to comply with the latest IEC 60092-504 and IEC 60533 editions (call points)

Test	Product / Industry Standard	Base / Test Standard	Test requirements	Mitigation statement.
Radiated immunity	IEC 60092- 504:2016	EN 61000-4-3	Additional Test frequency range from 2GHz to 6GHz @ 10V/m.	The call points do not have any active electronic components within their architecture, and therefore there is no risk of the radiated EMC affecting the functionality.
Radiated Emissions	IEC 60092- 504:2016	CISPR 16-1-1 CISPR 16-2-1	Additional Test frequency range from 2GHz to 6GHz (emissions limit 54 dBµV/m)	The call points do not have any active electronic components within their architecture, and therefore there is no risk of radiated emissions from within the product.

We have presented our position to the ABS certification body and are awaiting a response. If they deem it a risk, then it will require us to present a 3rd party test report to confirm the ability of the product to meet the requirements.

We apologise for the delay in renewal of the certification, and anticipate having the certificates reissued by the end of Q4 2019

Respectfully yours,

James Morgan

Global Fire Devices

Product Manger