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To Whom It May Concern:

L3 Communications of Sarasota, Florida, has lodged an applications with the UK Marine Type Approvals Board for assessment of their product :

L3 Communications, Hardened Voyage Recorder Type - HVR00-xxx-00

as a major component for use in Voyage Data Recorder (VDR) systems, in conjunction with third party manufactured data handling and control electronics.

The equipment comprises the semiconductor final recording medium housed in a Protective Capsule. The L3 HVR receives data from, and communicates to, the third party data interfacing and control electronics via an industry standard "Ethernet" serial connection. The L3 HVR is not designed for float-free operation.

This letter gives the conclusion in the light of the assessment which has been carried out, that the following tests and inspections required by IEC 61996 (The Performance Standard for Shipborne Voyage Data Recorder (VDR) equipment) are accepted as proven for the purposes of future Type Approval applications.

The relevant clauses from IEC 61996 are:-

By Inspection: 4.3.4.2, 4.3.4.3, 4.3.4.3.1, 4.3.4.3.2, 4.3.4.3.3, 5.2, 5.3 and 5.4

By Testing: 6.1.13.2/3, full pseudo-random data load equivalent to 12 hour recording used for all the protective capsule survival tests.
6.1.13.4 - Shock,
6.1.13.5 - Penetration,
6.1.13.6 - Fire,
6.1.13.8 - Deep sea Immersion,
6.1.13.9 - Required results and recovery of 12hr data load.

Test reports detailing each of the above tests were submitted and the assessment included test witnessing and inspections by a DERA officer at the L3 facility in Sarasota, Florida.



A technical construction file comprising descriptions, build standard details and test reports is held by DERA Fraser under reference DERA-TAN-01/01 and can, with the permission of L3 Communications be included by reference in applications for UK Type Approval of a full VDR system that utilises the L3 HVR module.

The testing of a full Voyage Data Recorder (VDR) system which incorporates the L3 HVR module will need to address all clauses of IEC 61996 other than those identified above and prove that the integration of the L3 HVR into the operational Voyage Data Recorder system is satisfactory in all respects.

Voyage Data Recording equipment is at present identified as Item A.2/4.17 in annex 2 of the amending Directive (98/85/EC) to the Marine Equipment Directive(MED) (96/98/EC). This means that for the time being the conformity of the equipment is subject to National Type Approval. When this class of equipment is transferred to Annex A1 of the Directive, we would expect no difficulties in transferring the approval status providing there has been no significant change in the performance standard (IEC 61996).

The above statements are made by DERA in our capacity as UK Marine Type Approval Authority and Notified Body. They set out our view that the L3 HVR module can be treated substantially as a stand-alone module in respect of the specified requirements enumerated above, and has been adequately tested against those requirements for type approvals purposes; they do not have any authority over the acceptance or conduct of any other approvals body.

Your Sincerely,

P J Goddard
Head of Assessment.
EU Notified Body No. 0191
UK Marine Type Approval Authority