

## Attestation of Hermon Pon

## On behalf of Iridium Satellite LLC

On April 12, 2010, TRaC EMC & Safety Ltd. of Malvern, United Kingdom, in its capacity as a Telecommunications Certification Body (TCB) issued to Iridium Satellite LLC a grant of equipment authorization (certification) under FCC ID number Q639602. The grant was based on testing of the Iridium 9602 transceiver module. The testing was conducted by TRaC Telecoms & Radio of Up Holland in West Lancashire, United Kingdom, and memorialized in Test Report No. 0F3048WUS1 dated March 22, 2010. The test report stated that the peak output power of the 9602 module was 1.41 Watts. The grant simply stated that the output power was 0.67 Watts.

In September 2011 Iridium sought to make a Class II permissive change in the device identified as the 9602SB, a transceiver module similar to the 9602 and which had been approved under FCC ID Q639602-SB under a grant issued on December 20, 2010, by . TRaC EMC & Safety Ltd. The original test report for the 9602SB was issued by TRaC Telecoms & Radio as Report No. TTR-002027WUS1 dated November 17, 2010. The test report stated that the peak output power was 1.36 Watts. The grant also stated that the output power was 1.36 Watts. TRaC EMC & Safety Ltd rejected the proposed permissive change upon reviewing the test report for the change because the output power exceeded that of the original grant. This rejection then prompted a review of the output power measurement technique and a consultation by Iridium and our development consultant with TRaC Telecoms & Radio. As a result of those consultations, it was determined that the sensor employed with the power meter used in the original measurement yielded erroneous information due to the way the sensor interacted with the pulsed Iridium signal.

This report of an error also prompted a review of the 9602 original test report and resulted in the determination that the peak output power levels as stated in both the 9602 and the 9602SB original reports were incorrect for the same reason.. As a result, both devices were re-measured and updated reports have been prepared.

Because of these errors we have instituted new procedures at Iridium for the review of certification test reports and grants. We have also insisted that our testing organizations



perform an additional review before certification applications are submitted to the Commission or to a Telecommunications Certification Body (TCB). The additional procedures have been created with the goal of reducing the likelihood of errors of the sort that affected the original grants of the 9602 and the 9602SB.

In light of this situation, we have requested TRaC EMC & Safety Ltd., as the TCB that issued the original grants for both devices, to reopen the grants with the cooperation of the U.S. Federal Communications Commission, supply corrected test reports, and issue corrected grants.

Signed under penalty of perjury.

/s/ Hermon Pon Date November 15, 2011

Hermon Pon VP, Technology