

Manuel Genswein
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Fact about the 3rd revision of the legal standard for avalanche rescue transceivers ETS 300 718

This documents makes some of the correspondence concerning the modification of the legal standard for avalanche rescue transceivers ETS 300 718 within the avalanche community publicly available.

It should make clear that:

- all manufacturers were clearly aware of the proposed modification and the possible impact
- the manufacturers which developed solutions which would not be compatible to the proposed standard, were individually and clearly made aware of the safety issues and the proposed changes
- the manufacturers group called by ETSI and lead by Mr. Borroni did not take any action although they were fully aware of the proposed changes
- all the information was publicly available on the internet and manufacturers which are ETSI member were kept up to date by automated email lists
- several organisations representing transceiver users have clearly shown their support
- Manuel Genswein and Werner Munter have entered their formal proposal to ETSI after a small set of user organizations (due to time pressure) and all manufacturers were aware of the proposal and its consequences
- As well other industries with very similar problems like the sea rescue beacons had to implement exactly the same modifications a few years ago. The modifications were implemented in a very similar way than proposed for ETS 300 718
- Werner Munter and Manuel Genswein are not at all against more powerful avalanche rescue transceivers, but we would clearly like to see the advantages in its function as an avalanche rescue device

Pieps:

In June 2002 Pieps invites me to give a presentation about avalanche rescue with transceivers. The presentation takes place in early June.

During the presentation, an engineer brings up the question of additional functions such as an altimeter, compass etc. I very clearly point out that there is a serious safety problem in the practical application of such equipment as I did it always in all the years of teaching when this specific question came up.

During the following month and year, I continuously remember Pieps of that fact as I realized that they do not seem to abandon their plans to integrate additional functions. Several leading members of the Pieps team were clearly made aware that the additional functions might be prohibited by the revised legal standard.

Barryvox:

At ICAR in Malbun, Mr. Wenk, representative of Mammut Barryvox presents the case study "Barryvox with inclinometer".

In this period Werner Munter and myself join together to make a common effort against function of a transceiver which are not any more connected to its original target, to be a potentially life saving device which should provide good search and transmit capabilities. Our effort should, together with the support of more user organizations lead in a modification of the legal standard for avalanche rescue transceivers ETS 300 718.

I personally inform Ascom, Girsberger Elektronik and Mammut that Munter and Genswein will be pushing this modification.

To get the support and opinion from user organisations and the European Telecommunication Standardization Institute, the following letter is sent to one organisation in the most important alpine

countries. Time is critical as our target is to have such a standard released before the first products with additional functions are on the market.

QUOTE

Looking at the further development of avalanche rescue transceivers, we [Munter and Genswein] are very concerned about the tendency of integrating orientation and communication functions, such as compasses, altimeter, inclinometers etc. into future products.

For obvious reasons, an avalanche rescue transceiver should always be worn in a safe and protected position while touring in the outdoors. The "new" functions (as mentioned above) would be mainly used when the avalanche danger degree is fairly high and people start to feel unsafe. This means, that the user would then take the avalanche rescue transceiver out of the safe place - normally on the innermost layer of clothing - in order to access those "additional functions". In reality, this means clearly, that the avalanche rescue transceiver will not be protected exactly in those moments when the user is very likely to take higher risks.

Although there are not yet such products on the market, we both have clear indications that several manufactures are working on such solutions to be implemented in their future products. Some of the prototype versions have already been presented to opinion leaders in the avalanche community.

Transceiver manufactures are mainly trying to build in such additional function in order to have stronger marketing arguments.

None of us would deny the importance of such tools, but we both strongly feel that they should be integrated in already existing navigation or communication tools such as GPS systems and NOT in an avalanche transceiver.

There are already powerful tools on the market, for example GPS, compass and barometric altimeter combinations.

Trying to pursue the avalanche transceiver industry to abandon their plans is a very difficult task, as the potential financial profit is a very strong argument for them.

Furthermore all new generation avalanche rescue transceivers have integrated microprocessors, A/D converters, LCD etc. which makes it quite easy for the manufacturers to add on more "functions".

For this reason, we felt that only a legal standard for avalanche transceivers, such as ETS 300 718 could save such clearly safety relevant tools to become toys in the future. The idea that we could soon see backcountry skiers navigating in bad weather conditions through avalanche terrain, measuring out slope angles or communicating with their friends with their potentially life saving transceiver just in their hands is our worst case scenario perspective.

We would therefore like to propose to add to ETS 300 718 a paragraph that forbids additional functions for navigation, avalanche danger assessment, communication etc. if the use of those functions require the avalanche rescue transmitter to be removed from its safe carrying position.

UNQUOTE

We get answers from:

- ICAR:

QUOTE:

Internationale Kommission für Alpines Rettungswesen IKAR
Commission Internationale de Sauvetage Alpin CISA
Gratwölstrass 38, CH-8460 Marthalen
Tel G: 052 630 60 05 Tel P: 052 319 17 82
Fax G: 052 630 60 10 Fax P: 052 319 35 33
E-Mail G: toni.grab@ezv.admin.ch E-Mail P: grab-fuchs@bluewin.ch
Schaffhausen, 20.02.2003 Toni Grab

mike.sharpe@etsi.fr
oliver.wheaton@ra.gsi.gov.uk
gavin.craik@etsi.fr
ollivier@anfr.fr
edmund.palkovich@bmvit.gv.at
losterzo@tin.it
tom.liholt@npt.no
ake.karlsson@pts.se
peter.jenni@bakom.admin.ch
e.tosato@interbusiness.it
andrea.borroni@fitre.it

Avalanche Rescue Transceiver as Combination Device

Dear Sirs,

We received knowledge that avalanche rescue transceiver manufacturers want to combine the beacons with extra functions, not at last to succeed in higher retail numbers. That the manufacturers are thereby willing to reduce the core function of "lifesaver" is from the IKAR's point of view incomprehensible.

Compass, altimeter, inclinometer are used in particular moments (poor visibility, snowfall, difficulty finding the way, on steeper slopes) as well as in situations where avalanche danger is present.

In a critical, not harmless, situation the avalanche rescue transceiver needs to be "protected", on the body. We rescuers don't want to rescue avalanche beacons, but people.

Are – in a critical moment – transceivers in the hands instead of on the body we risk to find only the device instead of the person.

The IKAR committee is unanimously of the opinion that the legal standard for avalanche rescue transceivers needs to be worded in a way so that no extra functions reducing the effectiveness can be added.

Yours sincerely,
Toni Grab
President IKAR

Cc:
munter@slf.ch
Manuel@genswein.com

UNQUOTE

- ANENA :

QUOTE

10.03.2003 16:39

Subject: About avalanches beacons development

From: François Sivardière [francois.sivardiere@anena.org]

To:

BORRONI Andrea; e.tosato@interbusiness.it; peter.jenni@bakom.admin.ch; ake.karlsson@pts.se; tom.liholt@NPT.NO; losterzo@TIN.IT; Edmund.palkovich@bmvit.gv.at; ollivier@anfr.fr; Gavin.Craik@etsi.fr; oliver.wheaton@ra.gsi.gov.uk; Mike.Sharpe@etsi.fr

CC:

KASHUBA; HEREFORD John; EDGERLY Bruce; SCHOBER Michael; MULLER Peter; BORRONI Andrea; MEIER Felix; KROLL Franz; BAUMANN Martin; TOUCHARD Pierre-Jean; LUC Jacques; BOYER Dominique; GIRAUDON Patrick; BURGARD Philippe; GENSWEIN Manuel; REY Claude; ZUANON Jean-Paul; ATKINS, Dale; kobie@frontier.net; GRAB Tony

Dear Sirs,

ANENA is the French organism that groups all the people involved in and affected by snow and avalanche safety in France. Members of ANENA are avalanche professionals (ski-patrollers, mountain guides, mountains rescuers, etc.) as well as people practising winter sports (French Alpin Club for example).

ANENA's attention has been drawn to the tendency of integrating orientation and communication functions, such as compasses, altimeter, inclinometers, etc., into future products of avalanche rescue transceivers. Although there are not yet such products on the market, ANENA has clear indications that several manufacturers are working on such solutions to be implemented in their future products. Some of the prototype versions have already been presented to opinion leaders in the avalanche community. Transceiver manufacturers are mainly trying to build in such additional functions in order to have stronger marketing arguments.

The executive board of ANENA, after it's meeting on March 3rd, has given its opinion about this point : As a principle, safety functions must not be mixed with other functions (whatever they may be). This is a fundamental principle concerning safety gears : independence of the functions. As an aim, beacons have to allow the localization of a buried victim, not something else.

With additional functions, the price of transceivers will increase. Even if it is only five or ten euros, it is too much : their high price is the first reason why people do not buy them. So these additional functions will not help to get people buy and wear beacons.

The beacons now available on the market are already enough complicated to use. New functions will make them more complicated. "More complications" is not an improvement for beacon. Furthermore, there are already a big amount of different beacons, which does not help to know how they work. New functions will increase this diversity which is against safety.

For obvious reasons, an avalanche rescue transceiver should always be worn in a safe and protected position while touring in the outdoors. The new functions would be mainly used when the avalanche danger degree is fairly high and people start to feel unsafe. This means, that the user would then take the avalanche rescue transceiver out of the safe place - normally on the innermost layer of clothing - in order to access those additional functions. In reality, this means clearly, that the avalanche rescue transceiver will not be protected exactly in those moments when the user is very likely to take higher risks.

Trying to pursue the avalanche transceiver industry to abandon their plans is a very difficult task, as the potential financial profit is a very strong argument for them. Furthermore all new generation of avalanche rescue transceivers have integrated microprocessors, A/D converters, CD, etc., which make it quite easy for the manufacturers to add on more functions. For this reason, ANENA is the opinion that only a legal standard for avalanche transceivers, such as EN 300718 could save such clearly safety relevant tools to become toys in the future.

ANENA would therefore like to propose to add to EN 300718 a paragraph that forbids additional

functions for navigation, avalanche danger assessment, communication, etc.

This email has only the intent to give you an idea about what ANENA is preoccupied with and what ANENA would like to propose. Please let me know to whom ANENA has to address its proposal and ANENA will work out a formal proposal.

Best regards,

François SIVARDIERE, Directeur de l'ANENA.

Mél : francois.sivardiere@anena.org

Association nationale pour l'étude de la neige et des avalanches

15 rue Ernest Calvat, 38000 Grenoble, France.

Tél : 04 76 51 39 39, Fax : 04 76 42 81 66.

Web : www.anena.org

UNQUOTE

With this email, all the manufacturers were fully aware and informed of what is going on.

At least one manufacturer seems to take the initiative and shows full support as I quickly get the following email back from ANENA:

QUOTE

12.03.2003 15:03

Subject: Fw: About avalanches beacons development

From: François Sivardière [francois.sivardiere@anena.org]

To: GENSWEIN Manuel

Bonjour Manuel,

Ci-joint la réponse de Ortovox concernant l'action auprès de l'ETSI.

Penses-tu qu'il soit nécessaire d'envoyer le courrier de l'ANENA à la personne suggérée par Franz Kroll ?

Cordialement.

François SIVARDIERE, Directeur de l'ANENA.

Mél : francois.sivardiere@anena.org

Association nationale pour l'étude de la neige et des avalanches

15 rue Ernest Calvat, 38000 Grenoble, France.

Tél : 04 76 51 39 39, Fax : 04 76 42 81 66.

Web : www.anena.org

----- Original Message -----

From: "Franz Kroell" <fkroell@ortovox.com>

To: <francois.sivardiere@anena.org>

Sent: Tuesday, March 11, 2003 5:28 PM

Subject: Antw: About avalanches beacons development

> Dear Francois,

>

> we discussed your mail with Mr. Kampel and he also agrees with your arguments.

> Our experience with the EN:

> We tried to implement

>

> A) the basic values of the standard

> B) the safe multiple search

> C) the search strip width

>

> But the audience did not follow these basic suggestions.
> You may adress your arguments to Mark BOGERS, European Commission. His
adress: Mark.Bogers@cec.eu.int
> We will support your effort.
>
> Best regards
>
> Franz Kröll
>
> O R T O V O X
> sportartikel gmbh
> franz kroell
> rotwandweg 5
> 82024 taufkirchen
> germany
> tel.: +49 89 666 740
> fax: +49 89 666 74 20
> e-mail: fkroell@ortovox.com
> net: <http://www.ortovox.com>

UNQUOTE

As well from the United States we get positive feed back, again CC to all manufacturers as well:

QUOTE

16.03.2003 23:44

From: caic [caic@qwest.net]

To:

François Sivardière; BORRONI Andrea; e.tosato@interbusiness.it; peter.jenni@bakom.admin.ch;
ake.karlsson@pts.se; tom.liholt@NPT.NO; losterzo@TIN.IT; Edmund.palkovich@bmvit.gv.at;
ollivier@anfr.fr; Gavin.Craik@etsi.fr; oliver.wheaton@ra.gsi.gov.uk; Mike.Sharpe@etsi.fr

CC :

KASHUBA; HEREFORD John; EDGERLY Bruce; SCHOBER Michael; MULLER Peter; BORRONI
Andrea; MEIER Felix; KROLL Franz; BAUMANN Martin; TOUCHARD Pierre-Jean; LUC Jacques;
BOYER Dominique; GIRAUDON Patrick; BURGARD Philippe; GENSWEIN Manuel; REY Claude;
ZUANON Jean-Paul; ATKINS, Dale; kobie@frontier.net; GRAB Tony

Subject : Re: About avalanches beacons development

Francois ... I think ANENA is correct to oppose the bundling of new features (for new uses) into beacon design.

Beacons should be used for one purpose only: a speedy rescue. Though I have not asked the opinion of the 13 staff of the Colorado Avalanche Information Center, I feel sure that as a group, we too would oppose this trend.

In the US, the American Avalanche Association speaks for many hundreds of avalanche professionals and is the agency that should respond to the problem raised by ANENA. Dale Atkins, whom you know well, is the chairman of the Rescue Committee. If you seek the support of the AAA, you should contact Dale to take this matter up with the AAA Board at their next meeting scheduled for late April.

Best wishes,
Knox Williams

UNQUOTE

- Safety commission of the German Alpine Club:

QUOTE

From: Dieter_Stopper@alpenverein.de

To: manuel@genswein.com; mike.Sharpe@etsi.fr; sport@stubai.com
Subject: Normergänzungsvorschlag VS-Geräte

Sicherheitsforschung

Sicherheitsforschung des DAV Von-Kahr Str. 2-4 D-80997 München

Mike Sharpe
ETSI
Frankreich

- Sicherheitsforschung des Deutschen Alpenvereins
Von-Kahr Str.2-4
D-80997 München
Tel. (089) 140 03-60
Fax (089) 140 03-12
E-Mail: Dieter_Stopper@alpenverein.de

12.03.2003

Normergänzungsvorschlag zur ETS 300 718 bezüglich körpernaher, gesicherter Position eines VS-Geräts

Sehr geehrter Damen und Herren, sehr geehrter Herr Sharpe,

ein VS-Gerät wird im Sendemodus betrieben, falls Lawinengefahr besteht oder bestehen könnte. In diesem Fall muss das VS-Gerät „unverlierbar“ mit dem Körper des Nutzers verbunden sein. Die Sicherheitsforschung sieht eine Gefahr für den Nutzer eines VS-Geräts, falls er dieses im Sendemodus von einer körpernahen, gesicherten Position nimmt, um zusätzliche Funktionen wie zum Beispiel Hangneigungsmesser, Kompass, Höhenmesser etc. bedienen zu können.

Als Normzusatz würde die Sicherheitsforschung des DAV und auch der Leiter Bergsteigen des DAV – sinngemäß – folgende Ergänzung der Norm ETS 300 718 begrüßen:

Wird das VS-Gerät im Sendemodus betrieben, ist zu gewährleisten, dass das VS-Gerät zu jedem Zeitpunkt in einer körpernahen, gesicherten Position getragen werden kann. Diese Forderung ist insbesondere bei der Nutzung sonstiger Funktionen eines VS-Geräts wie zum Beispiel Hangneigungsmesser, Kompass, Höhenmesser etc. zu erfüllen. Zusatzfunktionen dürfen außerdem das Sendeverhalten des VS-Geräts nicht beeinträchtigen.

Mit freundlichen Grüßen

Leiter Sicherheitsforschung
Dieter Stopper

Leiter Bergsteigen
Karl Schrag

UNQUOTE

In spring 2003, Felix Meier and I discuss over the phone possible ways of integrating the proposal in the standard. Like the experts at ETSI, Felix Meier proposes a strict regulation and makes me aware of the different parts of the standard where it should be implemented in order to be effective.

My original idea to “shut the door” only to a certain extent and leave it open for certain applications which might make sense in the future seemed to be unrealistic. As I was aware of two projects going on with medical sensors which might be connected to the transceiver ones in the future, I tried first to keep the wording so that certain functions would still be allowed if they are in direct connection with the rescue process, however, even together with experts it was not possible to come down to a solution

without unwanted back holes.

The ETSI experts explicitly mention that it is at all times possible to reopen the door in case a future application which makes sense and does not imply the above mentioned safety issues will become available. However, it would then mean that just this specific application would be allowed.

ETSI called Mr. Borroni as transceiver manufacturer himself and leader of the former revision 2 task group involving all major manufacturers to give their opinion on Munter's and Genswein's proposal. The emails below show the involvement of Mr. Borroni as the leader of this group in the past.

QUOTE

From: Michael Sharpe [Michael.Sharpe@etsi.org]
To: Andrea Borroni
CC: Manuel Genswein; e.tosato@interbusiness.it; Oliver Wheaton_Internet;
ERMSupport

Dear Mr Borroni

I attach the original email from Mr Genswein. It would probably be best if you spoke

to him directly about the details of the proposed update.

I enclose some relevant documents:

- a new work item proposal form. To amend the standard, a new work item proposal will have to be made to the next meeting of TC ERM. (ERM#19, 17 to 21 March 2003, Sophia Antipolis). In order to be accepted, the work item needs a nominated rapporteur and four supporting members. Currently BMWI (Germany), Federal Ministry for Transport (Austria) and OFCOM (Switzerland) have indicated their willingness to support the activity.

- copies in Word format of the existing standard

- The ETSI Guide (EG 201 399) and Template (SR 001 470)

- The EC Decision which applied article 3.3e to this equipment.

It should be noted that articles 2 and 3 are Harmonised Standards under the R&TTE Directive, and may not be concerned by the updates to part 1 made for operational reasons.

With best regards

Michael Sharpe

ETSI Secretariat

michael.sharpe@etsi.org

-----Original Message-----

From: Andrea Borroni [mailto:andrea.borroni@fitre.it]

Sent: lundi 3 février 2003 20:43

To: Michael Sharpe

Cc: e.tosato@interbusiness.it

Subject: Re: Avalanche Beacons

Dear Mr. Sharpe,

following Mr. Tosato's indication I write directly to you about the update proposal of EN300718. I've been the rapporteur and team leader of the Drafting Workgroup of such EN and I am interested in getting this update proposal in order to circulate it among team participants, to get reactions from the Avalanche Beacons community. Since our team was composed by all the involved parties (manufacturers, users and rescue organizations) and included the most knowledgeable people in the world about this matter, I think it would be useful to circulate this proposal among them in order to see if there is the interest to build-up the team again to make a revision of this EN. My feeling is that this could be possible, since there are some issues regarding radio and non-radio aspects that are still under debate in this community.

Therefore, I would appreciate if you send me some more information about this update proposal and its origin, so that I can share it and give you a feedback about it.

Thank you and best regards,
Andrea Borroni
FITRE S.p.A.

----- Forwarded by Andrea Borroni/Fitre on 28/01/2003 17:21 -----
enrico.tosato@ties.itu.int

To: Michael Sharpe <Michael.Sharpe@etsi.org>, andrea.borroni@fitre.it
cc: losterzo@tin.it

27/01/2003 23:45

Subject: Re: Avalanche Beacons

Dear Andrea,

as you have been the Rapporteur on the published ETSI Standard as relevant, I feel you may be interested on this "story". I encourage you to get in touch with Mike Sharpe directly in order to understand more and see what we can do. Please keep me in copy.

Kindest regards, Enrico.

Quoting Michael Sharpe <Michael.Sharpe@etsi.org>:

> Dear Roberto

>

> I have received a proposal from outside ETSI to update the standard EN
> 300 718 on avalanche beacons.

>

> The concerns expressed are specifically concerned with the safety &
> operational aspects, rather than the radio aspects.

>

> I have two questions. First of all, as an administration of an alpine
> country, would Ministero delle Comunicazioni be prepared to support
> work to develop the standard (in order to get over the "four
> supporting members" rule)?

>

> The second question is over finding expertise. Do you have contact
> with the ministry responsible for alpine safety, who may be able to
> assist in finding input from a user perspective?

>

> I have asked a similar question to the other Alpine countries. So far
> Germany (Thomas Weber) and Switzerland (Peter Jenni) have indicated
> their support. I am waiting for an answer from Austria (Edmund
> Palkovich) and France (Yves Ollivier).

>

> All the best

> Mike S.

> Michael Sharpe

> ETSI Secretariat <http://www.etsi.org>

> <http://portal.etsi.org> (for active members)

> 650 Route des Lucioles

> F-06921 Sophia Antipolis Cedex

> michael.sharpe@etsi.org

UNQUOTE

Reaction of the manufacturer's group:

Mr. Borroni never gets back with any information from this group. However, within this period of time where the manufacturers group was asked give feed back, Mr. Meier who has worked closely together with Mr. Borroni in this group in the past, lets me know that the proposal of Munter and myself has petered out (German: Wörtlich: Die Sache ist versandet)

At ETSI's ERM commission spring meeting, I presented our proposal together with the supporting letters received by the user organisations. After an introduction in the application of avalanche rescue transceivers for a committee mainly formed by telecommunication engineers, I showed practically what it might mean to use additional function in the field and made them aware of the potential safety issues. A member of the committee mentioned that this case is very similar to the sea rescue beacons where they had to prohibit additional functions already a few years ago for the same safety issues.

The commission decides that Mr. Borroni, transceiver manufacturer himself and leader of the former revision 2 task group involving all major manufacturers will be the convenor of the newly formed task group 36 (avalanche rescue transceivers).

As the rapporteur of a proposal need to represent an official ETSI organisation, OFCOM Switzerland was kindly willing to take me on as rapporteur in their name.

I personally inform Felix Meier by phone about the ETSI meeting and my official representation with OFCOM Switzerland.

At the next ETSI's ERM commission meeting in early summer, a group of standardization experts among those who have supported our proposal from the very beginning on create the current proposal based on the initial proposal of Manuel Genswein and Werner Munter and closely regarding the way how this modification has been implemented in the legal standard for sea rescue beacons. There is still absolutely no response form the manufacturers group at this time. As I was in hospital for a major back operation in early June, it was impossible for me to attend this meeting. Over the phone, I was kept up to date on the proposed text version.

On July 7, ETSI start s the "approval by correspondence" procedure by posting the information to ERM@LIST.ETSI.ORG. A list every transceiver manufacturer which is ETSI member should be signed up to, especially as they are fully aware that modifications were going to be proposed.

Furthermore, almost all the information is available for free in the public section of <http://portal.etsi.org>

Try it yourself and you will see:

- 1: Go to <http://portal.etsi.org>
- 2: Scroll down to "Service index"
- 3: Click on "ETSI Work Programme"
- 4: Click on "EN - European Standard" listed under "Type"
- 5: Click in the field "Number" and insert 300718 as this is the number of the standard for avalanche rescue transceivers
- 6: Click on "search" above
- 7: You will see: The entire work program is publicly available for everybody. You can now find out much more information by clicking on the individual items. There are no secrets, the modification of a standard is a publicly official and democratic procedure!

QUOTE

Von: Michael Sharpe [SMTP:Michael.Sharpe@ETSI.ORG]
> Gesendet am: Montag, 7. Juli 2003 15:01
> An: ERM@LIST.ETSI.ORG
> Betreff: EN 300 718-3 for approval by correspondence
>
> To members of ETSI ERM
>
> ERM members are invited to consider the attached document which was
> presented to TC ERM#20 (16 to 20 June 2003).
>
> The formal approval of ERM is now being sought to send this document to
> One-step Approval Procedure (OAP).
>
> Any delegates who wish to object to the document being sent to OAP are
> invited to inform me of the reasons for their objection by 21 July 2003.
>
> With best regards
>
> Michael Sharpe
> ETSI Secretariat Radio Competence Centre
>
> TP: +33 4 92 94 43 02
> TF: +33 4 92 38 49 02
> mobile: +33 6 07 59 08 44
> e-mail: michael.sharpe@etsi.org
>
> ETSI, 15 years of Standards Excellence <<20_102r1.zip>>

UNQUOTE

During the approval by correspondence period, a British mountain guide posts his contributing opinion. It shows clearly that the procedure is open for feed back even from end users at this stage:

QUOTE

To members of ETSI ERM
Members are invited to note the attached communication received at the Secretariat concerning the draft revision of EN 300 718-3 which is on approval by correspondence until 27 July.
For the sake of good understanding, I do not consider this to be an opposition my a member to the approval of this draft. If any member should wish to abject to this draft standard being approved for OAP, please let me know the reasons for your objection before 27 July.
With best regards

Michael Sharpe
ETSI Secretariat Radio Competence Centre
TP: +33 4 92 94 43 02
TF: +33 4 92 38 49 02
mobile: +33 6 07 59 08 44
e-mail: michael.sharpe@etsi.org
ETSI, 15 years of Standards Excellence

-----Original Message-----

From: Brian Copsey_Internet
Sent: 09 July 2003 11:07

To: Michael Sharpe

Subject: FW: Avalanche Transceivers - revision of standards

[Mike can you forward this to the group, on way to airfield](#)

Brian

-----Original Message-----

From: Colin & Jayne Firth [mailto:firth@onet.co.uk]

Sent: Tuesday, July 08, 2003 9:04 PM

To: Bryan Business Copsey; Brian work Copsey; Brian Personal Copsey

Subject: Avalanche Transceivers - revision of standards

Dear Brian

re: Avalanche Transceivers - revision of standards

As a Mountain Guide with experience of British and Alpine snow - and avalanches - I am strongly of the view that the transceiver should be a stand-alone device, not incorporating any other device such as mobile phone, altimeter, compass etc.

1. Beacons need to be simple to operate by mountaineers who are perhaps only basically trained in their use. In the real situation a complex device would lead to confusion in operation.
2. Beacons need to be worn under inner garments, partly for warmth to maintain battery function but also to reduce the risk of losing the device if the outer garment is lost
3. Battery life would be greatly reduced by incorporation of other devices - which would be in use during the tour.

I am therefore of the opinion that the legal standard for avalanche rescue transceivers needs to be worded in such a way that no extra functions which could possibly reduce the effectiveness can be added.

Best wishes

Colin

Colin G Firth

British and International Mountain Guide

UNQUOTE

After a defined period of time, the approval by correspondence procedure ends without any objections.

QUOTE

Von: Michael Sharpe [SMTP:Michael.Sharpe@ETSI.ORG]

> Gesendet am: Mittwoch, 23. Juli 2003 16:53

> An: ERM@LIST.ETSI.ORG

> Betreff: FW: EN 300 718-3 for approval by correspondence

>

> To members of TC ERM

>

> Delegates are invited to note that the attached draft standard has been
> approved by correspondence by TC ERM for the One-step Approval Procedure
> (OAP), no objection having been received within the stated delay.

>

> With best regards>

> Michael Sharpe

> ETSI Secretariat Radio Competence Centre

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