

August 25, 2011

Authorization & Evaluation Division
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Extended Frequencies Justification.

Dear Sir/Madam:

This Portable 2-Way radio was designed to operate in the frequency bands 136MHz-174MHz.

To aid equipment authorization in other countries which accept the United States FCC Grant for Certification, Motorola is requesting that the FCC lists the frequencies 136-174MHz under FCC Rule Parts 90 on the FCC Grant.

For the FCC's Rule Parts 90 applications, this radio is used in systems by Federal and Public Safety agencies including Police, Fire, and Emergency Medical Services, etc. as indicated in the table below. Equipment programming is the responsibility of Authorized Service Personnel. Also, the radio complies with 47 CFR Part 90.203(e), in that the operator cannot directly program the transmit frequencies using the normally accessible external controls.

Per the FCC's KDB634817 guidance, "as an alternative to listing the exact frequencies, we acknowledge that it's a violation of the FCC Rules if this device operates on unauthorized frequencies.

Frequency Range (MHz)	Part 90	Part 80	Federal	Emission Designator Rule Part 80 & 90 11K0F3E/7K60F1E/ F1D/F1W/FXE/FXD
136 – 150.8			x	
150.8-161.6250	x	x		
161.6250-161.7750*				
161.7750-173.4	x		x	
173.4-174			x	

Sincerely,



Larry D. Larsen
Regulatory Coordinator
Email: Larry.D.Larsen@motorolasolutions.com

EXHIBITS 13C