

October 24th, 2012

Office of Engineering and Technology
Laboratory Division
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Att: JC Chen

Subject: Response to second Correspondence 42750 for Certification of Transmitter with
FCC ID: AZ492FT3826, EA596340

Hello Mr. Chen,

Please see below for our responses:

Q1. The EMC report, after removing all data marked "Not for FCC review," can only support Part 90 authorization. Please revise test report or add test report(s) for other applicable rule parts. All rules related to the underlying rule parts, not just the bandwidth, will need to be satisfied by the EUT.

A1. We have added the statement at the bottom of the second page of the Test Report, attached, which states "Important Note: The data in this test report meets or exceeds the technical requirements of FCC Rule Parts 22, 74, 80, and 90". Please note that the technical requirements were reviewed for all the above-mentioned rule parts and the data is compliant.

Q2. Form 731 lists all 4 rule parts (22, 74, 80, and 90) for the entire 136-174 MHz. This would require all 4 rule parts to be tested over all possible channels within 136-174 MHz. If the intention is to simply provide 25 kHz mode in non-Part 90 channels, please consider listing only Part 80 for those non-Part 90 channels and use the EF note code to cover the rest of channels.

A2. As noted in the above response that the radio complies to the technical requirements, as prescribed, in Rule Parts 22, 74, 80, and 90. We have no issues is the FCC lists the Rule Part Frequencies of 154.0-162.0125 MHz. We cannot correct the Form 731 now that the application was submitted. In addition, the FCC has approved all of our Part 80 applications as 136-174 MHz. See applications, FCC ID: AZ489FT3829, FT3828, etc.

Q3. Please review the extended frequency listing request letter, the listed ranges and rules parts should be correct (see Part 2.106) and consistent with Form 731.

A3. Per the FCC's KDB 634817 guidance, "as an alternative to listing the exact frequencies, we acknowledge that it is a violation of the FCC Rules if this device operates on unauthorized frequencies." However, we did list the frequencies ranges instead of including all the breaks in between, per Part 2.106. The frequencies may not match what is listed on the Form 731 because the input form is not user friendly and we will run out of room to add



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the emission designators, power, ppm, etc for each section of the band. The Frequency Justification letter is amended to show the Part 80 frequencies.

Q4. Per 90.205(s), instead of 90.203(r), indeed the output power can be as much as 20% higher than the power listed on the authorization. However, note that the power level listed on Form 731, 50 W, will become the rated power on the grant, not those higher numbers in the test report. Please confirm if this is the intent. Revise Form 731 if this is not the intent.

A4. You are correct and that is our intent to show 50 Watts on the grant and the maximum power on the grant notes.

Q5. Please review Emission Mask D again. The reference level should be the transmit power, not the highest point of the emission spectrum.

A5. For Occupied Bandwidth testing, after the unmodulated carrier's emission spectrum is captured on the spectrum analyzer, **the reference plot shall be referenced to 0dB.** Hence, the highest point on the plot has been reference to 0dB of the transmit power. Hence, emission Mask D calculation is correct. The test method has been revised in Ex07 test procedure.

6. Please clarify why the default frequency of the radio, 136 MHz, according to your 9/24 reply, is not a channel authorized for this radio (a Part 87 Aviation channel).

A5. 136 MHz is also used by the Federal Government and is a default test frequency, which is used for manufacturing purposes only. When an order is placed, only authorized frequencies, based on the customer's FCC License, will be programmed into the radio.

If you require any additional information, please contact me at (954) 723-5793 (Phone).

Sincerely,

A handwritten signature in black ink that reads 'Mike Ramnath'.

Mike Ramnath (signed above)

Manager, Regulatory Compliance

Email: Mike.Ramnath@motorolasolutions.com

EXHIBIT 13