

October 24th, 2012

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

Subject: Extended Frequencies Justification.

Gentlemen:

The APX2500/APX4500 Mobile 2-Way radio was designed to operate in the frequency band 136-174 MHz.

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

Frequency Range (MHz)	Part 90	Part 22	Part 74	Part 80	Federal	Grant Notes	Emission Designator Rule Part 90
136-150.8					x	EF, BF	8K10F1D/F1E/F1W, 11K0F3E
154.0-162.01250	x	x	x	x		EF, BF	""
161.6250-161.7750*			x			EF, BF	""
161.7750-173.4	x				x	EF, BF	""
173.4-174					x	EF, BF	""

* Canada

Sincerely,



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EXHIBIT 13C