

From: Michael Lewis

To: Behnam Ghaffari

Date: November 03, 2019

Subject: 0899-EX-CN-2019

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Message:

This is in response to correspondence reference number 51602 sent on 10/31/2019. For application file number 0899-EX-CN-2019, OET staff has notified Motorola Solutions, Inc. that "due to narrowbanding rules, the emission bandwidth cannot be greater than 12.5 kHz. Please change emission bandwidth for 406.1-420 MHz band to 12.5 kHz."

As explained in the narrative statement submitted with the application, Motorola Solutions has relocated development, test, and production of TETRA systems for use outside of the U.S. to its Elgin, IL facility and requires the requested experimental authority to operate transmitting devices intended for export that do not have an FCC ID. Devices are operated at extremely low powers and terminated into dummy loads to confine emissions within the manufacturing facility.

The wider bandwidth requested for the 406.1-420 MHz band is necessary to enable test and development of TETRA systems for export use only. Motorola Solutions has no intention of developing or marketing equipment capable of greater than 12.5kHz emission in this allocation for use within the United States, given the existing regulations.

Given this information, Motorola Solutions requests that OET reconsider the instructions to modify the pending application and continue its processing with bandwidths exceeding 12.5 kHz in the 406.1-420 MHz band. Please contact the following if any additional information is needed.

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