

From: Mike Ramnath

To: John Kennedy

Date: August 13, 2007

Subject: FCC File # 0151-EX-RR-2006

Message:

This is in response to your inquiry regarding Motorola's request for renewal of its experimental license with bandwidths of 20 kHz in the bands 138-144 MHz and 148-174 MHz rather than less than 12.5 kHz in accordance with the new narrowband requirements.

Motorola will comply with the new narrowband requirements as set forth in Section 90.203 of the Commission's rules and related decisions. If deemed necessary, however, Motorola will agree to and accept a condition on the renewal license that states:

Licensee should be aware of and comply with the Commission's narrowband requirements set forth in Section 90.203 of the Commission's rules and any other rules related to the equipment authorization, certification, manufacturing, marketing and operation of narrowband equipment in the 138-144 MHz and 148-174 MHz bands.

Nevertheless, Motorola would like to retain the existing authority in its experimental license to test equipment operating with a maximum of 20 kHz of bandwidth. Such authority will afford Motorola flexibility to design and test equipment that will be sold around the world, including in countries that do not apply a 12.5 kHz limit. Moreover, certain radio services in the U.S. are authorized and continue to use channels with bandwidths greater than 12.5 kHz (e.g. Part 74). Last, even the FCC's narrowband rules and decisions allow for the development of certain digital systems in the U.S. with 20 kHz channels if the efficiency is equivalent to that of two 12.5 kHz channels. See 47 C.F.R. Section 90.203(j)(5).

Please let me know if you have any questions or need further information.

Respectfully submitted,

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