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

Subject: Extend Frequencies Justification Original Application FCC ID: 2ABNA-TRM121

Company: Guangzhou Geoelectron Science & Technology Company Limited **Address:** No.704, 7/F, Building C, No.7, Cai Pin Road, Science City, Luogang District, Guangzhou, China

Dear Sir or Madam;

This Digital radio was designed to operate in the frequency bands 410-470MHz; To aid equipment authorization in other countries that accepts the United States FCC Grant for Certification, **Guangzhou Geoelectron Science & Technology Company Limited** Is requesting that the FCC list the frequencies 410-470MHz under FCC Rule Parts 90 and the Grant note code "EF".

For the FCC's Rule Part 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 Personal. 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 22	Part 74	Part 80	Part 90	Federal
410-450				х	
450-454		Х		х	
454-456		Х			
456-460	Х		х	х	
460-462.5375				х	
462.5375-462.7375*					Х
462.7375-467.5375			х	х	
467.5375-467.7375			x		
467.7375-470			Х	Х	

Please contact me if you require any additional information.

Guangzhou Geoelectron Science & Technology Company Limited

Signature:	James Yao	Date:	2019-08-20	
Name:	James Yao			
Title:	Project Manager			
Company:	Guangzhou Geoelectron Science & Technology Company Limited			