

SAIN3 LLC
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Justification Letter

Date: 2017-10-26

Federal Communications Commission
Authorization & Evaluation Division
7435 Oakland Mills Road
Colombia, Maryland 21046

Subject: Extended Frequencies Justification for Certification of Transmitter with
FCC ID: 2AN62-GD77

Dear Sir/Madam,

The transmitter was designed to operate in the frequency bands 136~174MHz and 400-470MHz.

To aid equipment authorization in other countries which accept the United States FCC Grant for certification, SAIN3 LLC is requesting that the FCC lists the frequencies 136~174MHz and 400-470MHz, under FCC Rules Parts 90 on the FCC Grant.

For the FCC's Rule Part 90 applications, this device 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 device complies with 47 CFR Part 90.203(e), in that the operator cannot directly program the transmit frequencies using the normally accessible external controls.

SAIN3 LLC attests that the device will not be marketed to USA users with the frequency band which is not allowed by the rule part 90.

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.

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For 136~174MHz:

| Frequency Range (MHz) | FCC Rule Part |
|-----------------------|---------------|
| 136-150.8 MHz | For Federal |
| 150.8-152.855MHz | FCC Part 90 |
| 152.855-154MHz | FCC Part 90 |
| 154-156.2475MHz | FCC Part 90 |
| 157.1875-157.45MHz | FCC Part 90 |
| 157.45-161.575MHz | FCC Part 90 |
| 161.575-161.625MHz | For Federal |
| 161.625-161.775MHz | For Federal |
| 161.755-161.9625MHz | FCC Part 90 |
| 162.0375-173.2MHz | FCC Part 90 |
| 173.2-173.4MHz | FCC Part 90 |
| 173.4-174MHz | For Federal |

For 400-470MHz:

| Frequency Range (MHz) | FCC Rule Part |
|-----------------------|---------------|
| 400-406 MHz | For Federal |
| 406.1-450 MHz | FCC Part 90 |
| 450-454 MHz | FCC Part 90 |
| 456-460MHz | FCC Part 90 |
| 460-462.5375MHz | FCC Part 90 |
| 462.7375-467.5375MHz | FCC Part 90 |
| 467.7357-470MHz | FCC Part 90 |

Sincerely,

Signature:

Print Name: Damon Cheng

Title: President