

May 06th, 2013

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

Att: JC Chen

Subject: Response to second Correspondence 42860 for Certification of Transmitter with FCC ID: ABZ99FT3091, Correspondence Number 43721, and Confirmation Number EA779063.

Dear Mr. Chen,

Please see below for our responses to your April 19, 2013 FCC communication:

1. The proposed grant note code BM (50-55%) is inappropriate when 90.205(s) allows only up to 20% power variation.

[Response 1: The Grant Note is for Variable Power of the radio 25-45 Watt and the power varies up to 55% of the rated power of 45 Watts. Rule Part 90.205 \(s\) may not applicable to the Grant Notes for Variable Power.](#)

2. Tune-up procedure on Page 7 of Exhibit 10C indicates that the maximum power limit in a production unit is 56 W. This would exceed the authorized $45\text{ W} + 20\% = 54\text{ Watts}$ permitted by 90.205(s). Please clarify.

[Response 2: This is a typographical error. The maximum power is 54 Watts and Exhibit 10 is now corrected.](#)

3. The test setup photo Exhibit 7B contains only photos of antennas.

[Response 3: Photos now include the vehicle, see Exhibit 7B.](#)

4. You are requesting Parts 22, 74, and 80 grants, in addition to Part 90, while the test report only demonstrates compliance with Part 90 rules. It is the applicant's responsibility to show compliance with the appropriate regulations instead of asking the Commission to take the data to find which rule sections that the data comply. Your approach is also contradictory when all 25 kHz test results are labeled "Not for FCC Review" and yet 25 kHz authorization is being requested for non-Part 90 rules parts. Please revise test report to compare test results against applicable rules sections that the applicant is requesting authorization.

Response 4: We have dropped the request for Rule Part 22, 74, and 80 at this time. See the amended Cover Letter to reflect this.

5. MPE/SAR assessment report also shows inconsistency in that if results outside 150.8-173.4 MHz are not applicable for FCC compliance demonstration (cover page), then there is no basis to approve operation outside this band.

Response 5: We have added a frequency Justification letter requesting the extended frequency range to aid certification in other countries including Canada according to the guidance given in KDB 634817.

6. It appears to this reviewer that the proper emission designators for 2-slot 4FSK should be F7D/F7E/F7W instead of F1D/F1E/F1W, the latter is currently given to both 1-slot 4FSK and 2-slot TDMA modes in Exhibit 6E.

Response 6: Based on recent FCC proceedings on emission designators addressing the ARRL waiver request for TRBO both the ARRL and the FCC use the term single slot TDMA to describe the subscribers talking to a 2 Slot TDMA base station, such as TRBO or P25 Phase 2.

While Motorola has historically labeled TRBO and P25 Phase 2 subscribers as 2 Slot TDMA radios the FCC now defines these subscribers as 1 slot TDMA because a given subscriber operates on 1 of the 2 available slots.

The NPRM and Order, DA 13-542 dated March 25, 2013, and NPRM and Order, FCC12-121 dated October 2, 2012 on the ARRL waiver that uses the single slot terminology. For future filings we are open to use 1 slot TDMA as the descriptor.

7. Page 117 of the user's manual lists many UHF antennas. Please clarify whether this device is applying for authorization in the UHF (403-527 MHz) band?

Response 7: A single User Manual is used for both VHF and UHF models domestically and international markets. The VHF antennas, that is, antennas specified with an operating range between 136-174 MHz, are used with the VHF models (136-174 MHz).

If you require any additional information, please contact me at (954) 723-5793 (Phone).

Sincerely,
/s/ Mike Ramnath (signed)
Mike Ramnath
Manager, Regulatory Compliance
954-723-5793