



Icom Inc.  
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Date: November 28, 2013

**To Whom It May Concern**

Subject: Justification Letter  
  
Applicant: Icom Incorporated  
Product: VHF H.H transceiver  
Model: IC-F3161DS  
FCC ID: AFJ289300

Dear Sir/Madam

Icom understands the following Part 90 VHF spectrum, and would like the FCC to certify the entire 136 to 174MHz spectrum to include the part 90 extended frequencies. This would be done to facilitate the requirements of agencies covered under NTIA spectrum usage. Government agencies complying with the NTIA instead of the FCC must purchase their equipment from private industry manufacturers who are governed under FCC rules. The conflict in spectrum allocation detracts from the options available to the government agencies for commercial off the shelf equipment which meets their required specifications such as the requirements stated in the Department of Interiors Narrowband Digital Radio Contract.

Part 90 "extended" frequencies.

- 136 ~ 137 MHz - Part 87
- 137 ~ 138 MHz - Part 25
- 144 ~ 148 MHz - Part 97
- 148 ~ 150.05 MHz - Part 25
- 156.2475 ~ 157.0375 - Part 80
- 161.575 ~ 161.625 - Part 22 and 80
- 161.625 ~ 161.775 - Part 22 and 74

Sincerely,

Icom Incorporated

Hideji Fujishima  
General Manager of Quality Department