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April 30, 2014

Office of Engineering and Technology Laboratory Division Equipment Authorization Branch FCC Laboratory7435 Oakland Mills Rd. Columbia, MD 21046

Re: Extended Frequency Justification on FCC ID: AIERIT37-146I

To whom it may concern:

The JBS-146i two-way desktop radio was designed to operate in the frequency band 150-174 MHz.

To aid equipment authorization in other countries within ITU regions 1, 2 or 3 which accept the United States FCC Grant for certification, Ritron is requesting that the FCC lists the frequencies 150-174 MHz under FCC Rule Parts 90 on the FCC Grant. This product is also intended for Federal end users.

For the FCC's Rule Part 90 applications, this radio is used in systems by OEM systems integrators as indicated in the table below. Equipment programming is the responsibility of Authorized Service Personnel. 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."

		Federal Customers/		Emission Designator
Frequency Range (MHz)	Part 90	Not Part 90	Grant Notes	Part 90
150.0000 - 150.8000		X	EF	11K0F3E
150.8000 - 156.2475	Х		EF	11K0F3E
156.2475 - 157.1875		X	EF	11K0F3E
157.1875 - 161.5750	Х		EF	11K0F3E
161.5750 - 161.7750		X	EF	11K0F3E
161.7750 - 173.4000	Х		EF	11K0F3E
173.4000 - 174.0000		X	EF	11K0F3E

Sincerely,

Sam L. Dulaney Chief Engineer

Ritron, Inc.

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