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July 24, 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: AIERIT39-16006

To whom it may concern:

The DTXM-160 6-watt OEM radio modem module was designed to operate in the frequency band 136-174 MHz. To aid equipment authorization in other services/countries which accept the United States FCC Grant for certification, but which are not governed by the FCC, Ritron is requesting that the FCC list the frequencies 136-174 MHz under FCC Rule Parts 90 on the FCC Grant. This is being requested to facilitate the requirements of agencies covered under NTIA spectrum usage. Government agencies complying with the NTIA instead of the FCC and other countries must purchase their equipment from private industry manufacturers who are governed under the FCC rules. This 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 Interior's narrowband Digital Radio Contract.

Per the FCC's KDB634817 guidance, "as an alternative to listing the exact frequencies, we acknowledge that it is a violation of the FCC Rules if this device operates on unauthorized frequencies."

Frequency Range (MHz)	Part 90	Other
136-150.8		x
150.8 -156.2475	x	
156.2475-157.1875		x
157.1875-161.575	x	
161.575-161.775		x
161.775 – 161.9625	x	
161.9625-162.0375		x
162.0375-173.4	x	
173.4 -174		x

Sincerely,

Sam J. Ordway

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