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November 20, 2020

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

Re: Extended Frequency Justification on FCC ID: AIERIT50-477DMR

To whom it may concern:

The RBS-477DMR two-way desktop radio is designed to operate in the frequency band 450-470 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 450-470 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."

Frequency Range (MHz)	Part 90	Federal Customers/ Not Part 90	Grant Notes	Emission Designators Part 90
450.0000 – 454.0000	x		EF	11K0F3E, 7K60FXD, 7K60FXE, 7K60FXW
454.0000 – 456.0000		x	EF	11K0F3E, 7K60FXD, 7K60FXE, 7K60FXW
456.0000 – 462.5375	x		EF	11K0F3E, 7K60FXD, 7K60FXE, 7K60FXW
462.5375 – 462.7375		x	EF	11K0F3E, 7K60FXD, 7K60FXE, 7K60FXW
462.7375 – 467.5375	x		EF	11K0F3E, 7K60FXD, 7K60FXE, 7K60FXW
467.5375 – 467.7375		x	EF	11K0F3E, 7K60FXD, 7K60FXE, 7K60FXW
467.7375 – 470.0000	x		EF	11K0F3E, 7K60FXD, 7K60FXE, 7K60FXW

Sincerely,

A handwritten signature in black ink that reads "Sam L. Dulaney".

Sam L. Dulaney
Chief Engineer
Ritron, Inc.
Email: sdulaney@ritron.com