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September 20, 2021

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: AIERIT51-16530

To whom it may concern:

The DTXM-165-0BN30I-M-FIPS, 30 watt, OEM radio transceiver was designed to operate in the frequency band 136-174 MHz.

To aid equipment authorization in other countries which accept the United States FCC Grant for certification, Ritron is requesting that the FCC lists the frequencies 136-174 MHz under FCC Rule Parts 90 on the FCC Grant.

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."

<u>Frequency Range (MHz)</u>	<u>Part 90</u>	<u>Federal</u>	<u>Grant Notes</u>	<u>Emission Designator Part 90</u>
136-150.8		x	EF	10K0F3E, 4K00F1E, 8K30F1E, 4K00F1D, 8K30F1D, 4K00F7W, 8K30F7W
150.8 -156.2475	x		EF	"
156.2475 - 157.1875		x	EF	"
157.1875 - 161.575	x		EF	"
161.575 - 161.775		x	EF	"
161.775 - 161.9625	x		EF	"
161.9625 - 162.0375		x	EF	"
162.0375 – 173.4	x		EF	"
173.4 -174		x	EF	"

Sincerely,

Sam L. Dulaney
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