Date: December 16, 2014

Office of Engineering and Technology Laboratory Division Equipment Authorization Branch Federal Communications Commission Laboratory 7435 Oakland Mills Road Columbia, MD 21046

Subject: Extended Frequencies Justification for Certification of Transmitter with FCC ID: AXI11283020

Dear Sir or Madam:

This transmitter was design to operate in the frequency range of 136 -174 MHz.

To aid equipment authorization in other countries that accept the United States FCC Grant for Certification, Vertex Standard USA Inc is requesting that the FCC list the above frequency/frequencies under FCC Rule Part 90 on the Grant.

For the FCC's Rule Part 90 application, this radio is used in systems by Federal and Public Safety agencies including Police, Fire, and Emergency Medical Services, etc. 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	Emission Designator
138-150.8*		Х	11KOF3E
150.8-154	х		
154-156.2475	Х		
156.2475-157.1875*			
157.1875-161.575	Х		
157.77-158.67	Х		
161.575-161.775*			
161.775-161.9625	Х		
161.9625-162.0375			
162.0375-173.4	Х		
173.4-174*			

*Canada

Please contact me if you require any additional information.

Sincerely,

Kimtallon a

Kim Uong **Regulatory Compliance Engineer** Tel: (954) 723-5422 E-mail: <u>Kim.Uong@motorolasolutions.com</u>