

Aug 14, 2017

Federal Communications Commission  
Authorization and Evaluation Division  
7435 Oakland Mills Road  
Columbia, MD 21046



**Codan Radio Communications**  
43 Erie Street  
Victoria, B.C.  
Canada V8V 1P8

Subject: Extended Frequencies Justification

To Whom It May Concern:

We, Codan Radio Communications, would like to submit the following justification to show the frequency range (150.8-173.4MHz) on the Grant of Equipment Authorization under Part 90 and Part 22 for FCCID: H4JCASC165A

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 operations on unauthorized frequencies. This radio is intended for use by federal agencies, public agencies, emergency services, as well as commercial, business, and industrial services. Additionally, it will be used in other countries that accept the FCC Grant of Equipment Authorization. These services account for a majority of users as described in the below table:

Frequency Range	Rule Part / Users
136 - 150.05	Federal (non-FCC), Other countries
150.05 - 150.8	90.265 (12.5 KHz)
150.8 - 152.855	90.203(j)(5),22
152.855 - 157.45	90.203(j)(5)
157.45 - 161.775	90.203(j)(5),22
161.775 - 162.0125	90.203(j)(5)
162.0125 - 173.2	90.265 (12.5 KHz)
173.2 - 173.4	90.203(j)(5)
173.4 - 174	Federal (non-FCC)

This radio complies with 47 CFR Part 90.203(e) in that the operator cannot program and transmit on frequencies, other than those programmed by the manufacturer, service or maintenance personnel, using the equipment's external operation controls. It is noted that the FCC rules would be violated if this radio is programmed to operate on frequencies outside of FCC (Part 90 and Part 22) Frequency Bands for users other than the Federal Government.  
Sincerely,

*Yours Sincerely,*

A handwritten signature in black ink, appearing to read 'Michael J. Cyr', with a stylized flourish at the end.

**MICHAEL J CYR**  
**Compliance Engineer**