

June 5, 2019

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 revised justification letter to show the frequency range (148-174MHz) on the Grant of Equipment Authorization under Part 90 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
148 – 150.7	Canadian Use
150.8 - 152.855	90
152.855 - 154	90
154 - 156.2475	90
157.1875 - 157.45	90
157.45 - 161.575	90
161.775 - 161.9625	90
162.0375 - 173.2	90
173.2 - 173.4	90
173.4 -174	Canadian Use

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) Frequency Bands for users other than the Federal Government.

Sincerely,

Kind Regards,

A handwritten signature in black ink, appearing to read 'Jay de Roode', with a long horizontal flourish extending to the right.

Jay de Roode
Compliance Officer