

December 10, 2010

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

Subject: Extended Frequencies Justification

Gentlemen:

The (K6630393X20) was designed to operate in the frequency bands (134-174MHz).

To aid equipment authorization in other countries that accept the United States FCC Grant of Certification, this will service as a request that the FCC list the frequencies of (134-174MHz) under the FCC Rules( Part 90) on the FCC Grant.

For the FCC's Rules Parts 90 applications, 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 only. In addition, 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)	RULE PART	RULE PART (IF APPLICABLE)	FEDS	EMISSION DESIGNATORS
136-150.8			X	11/16K0F3E,
150.8-161.6250	90, 80			“
161.6250-161.7750*				“
161.7750-173.4	90		X	“
173.4-174			X	“

\*These are Canada frequencies.

Regards,



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Engineering Division

Vertex Standard Co., Ltd.