



November 22, 2010
Federal Communications Commission
Equipment Authorization Division
7435 Oskland Mills Road
Columbia, MD 21046

Subject: FCC ID O25PZ-S100
Justification letter for expanded frequency range 136- 174 MHz

Gentlemen:
The PZ-S100 Portable 2-Way VHF radio was designed to operate in the frequency bands 136-174

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

For the FCC's Rule 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. 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)	Part 90	Feds	Grant Notes	Emission Designators Rule Part 90
136-150.8*		x	EF, BE	11/16K0F3E, 8K10F1D/F1E/F1W and 20K0F1E
150.8-161.6250	x		EF, BE	""""
161.6250-161.7750*			EF, BE	""""
161.7750-173.4	x	x	EF, BE	""""
173.4-174		x	EF, BE	""""

Truly yours,

Hwan-Dae Kim / Chief Engineer

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