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April 7, 2021

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

Subject: FCC ID: OGE-QSM
Extended Frequencies Justification

Gentlemen:

We, Qual-Tron, Inc., would like to submit the following justification to show the frequency range (138-158.3 MHz) on the Grant of Equipment Authorization under Part 90 for our FCC ID: OGE-QSM.

Per the FCC'S KDB 634817 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. 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 most users as described in the below table.

| Frequencies (MHz) | Part 90 | Federal | ITU Region |
|-------------------|---------|---------|------------|
| 138-144 | | X | 1,2,3 |
| 144-148 | | X | 1,2,3 |
| 148.0-150.8 | | X | 1,2,3 |
| 150.8-156.2475 | 90 | | |
| 156.2475-157.1875 | | X | 1, 2, 3 |
| 157.1875-158.3 | 90 | | |

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.

Sincerely,

Robert H. Kane, President
Qual-Tron, Inc.