

Applicant: Barrett Communications Pty Ltd  
 FCC ID: OW4-4050IP

**Head Office:**  
 Barrett Communications Pty Ltd  
 47 Discovery Drive, Bibra Lake,  
 WA, 6163 AUSTRALIA  
 Tel: +61 8 9434 1700  
 Fax: +61 8 9418 6757  
 info@barrettcommunications.com.au  
 www.barrettcommunications.com.au

August 31, 2023

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

**Subject:** Extended Frequencies Justification for Certification of Transmitter with FCC ID: OW4-4050IP.

Dear Sir/Madam:

This transmitter is designed to operate in the frequency ranges as described in the Exhibit 13a.

Barrett Communications Pty Ltd also requests that the FCC certify this product for the entire 1.5MHz to 30MHz band to meet the requirements of users authorized to operate between 1.5MHz and 2.0MHz as allowed by Title 47 CFR § 2.106.

This would be done to facilitate the requirements of agencies covered under NTIA spectrum usage. Government agencies complying with the NTIA instead of the FCC must purchase their equipment from private industry manufacturers who are governed under FCC rules. The conflict in spectrum allocation detracts from the options available to the government agencies for commercial off the shelf equipment which meets their required specifications such as the Department of Interiors. Please see frequency lists below.

The following table lists the CFR 47 Part 90 frequencies for a MF/HF mobile transceiver:

1.5 – 1.8 MHz	2.00 – 2.065 MHz	2.107 – 2.17 MHz	2.194 – 2.495 MHz
2.505 – 2.85 MHz	3.155 – 3.4 MHz	4.438 – 4.65 MHz	4.75 – 4.995 MHz
5.05 – 5.45 MHz	5.73 – 5.9 MHz	6.765 – 7.0 MHz	7.3 – 8.1 MHz
9.04 – 9.4 MHz	9.9 – 9.995 MHz	10.15 – 11.175 MHz	11.4 - 11.6 MHz
12.1 – 12.23 MHz	13.41 – 13.57 MHz	13.87 – 14.0 MHz	14.35 – 14.99 MHz
15.8 – 16.36 MHz	17.41 – 17.48 MHz	18.03 – 18.068	18.168 – 18.78 MHz
19.02 – 19.68 MHz	19.8 – 19.99 MHz	20.01 – 21.0 MHz	21.85 – 21.924 MHz
22.855 – 23.2 MHz	23.35 - 24.89 MHz	25.01 – 25.33 MHz	26.2 – 26.42 MHz
27.23 – 27.54 MHz	29.7 – 29.8 MHz		

The CFR 47 Part 90 "extended" frequencies are:

Frequency (MHz)	FCC Rule Part(s)	Frequency (MHz)	FCC Rule Part(s)	Frequency (MHz)	FCC Rule Part(s)
1.8 – 2.0	80, 97	2.065 – 2.107	80	2.17 – 2.1735	80
2.1735 - 2.1905	80, 87	2.1905 - 2194	80	2.495 - 2.505	Standard Frequency and Time signal
2.850-3025	87	3.205 - 3.155	Aeronautical Mobile	3.4 - 3.5	87
3.5-4.0	97	4.0 - 4.063	80	4.063 - 4.438	80, 87
4.65 - 4.7	87	4.7 - 4.75	Aeronautical Mobile	4.995 - 5.005	Standard Frequency and Time signal

Frequency (MHz)	FCC Rule Part(s)	Frequency (MHz)	FCC Rule Part(s)	Frequency (MHz)	FCC Rule Part(s)
5.45 - 5.68	87	5.68 - 5.73	Aeronautical Mobile	5.9 - 6.2	73
6.2 - 6.525	80	6.525 - 6.685	87	6.685 - 6.765	Aeronautical Mobile
7.0 - 7.2	97	7.2 - 7.3	73, 97	8.1 - 8.195	80
8.195 - 8.815	80, 87	8.815 - 8.965	87	8.965 - 9.04	Aeronautical Mobile
9.4 - 9.9	73	9.995 - 10.005	Standard Frequency and Time signal	10.005 - 10.1	87
10.1 - 10.15	97	11.175 - 11.275	Aeronautical Mobile	11.275 - 11.4	87
11.6 - 12.1	73	12.23 - 13.2	80	13.2 - 13.26	Aeronautical Mobile
13.26 - 13.36	87	13.36 - 13.41	Radio Astronomy	13.57 - 13.87	73
14.0 - 14.35	97	14.99 - 15.01	Standard Frequency and Time signal	15.01 - 15.1	Aeronautical Mobile
15.1 - 15.8	73	16.36 - 17.41	80	17.48 - 17.9	73
17.9 - 17.97	87	17.97 - 18.03	Aeronautical Mobile	18.068 - 18.168	97
18.78 - 18.9	80	18.9 - 19.02	73	19.68 - 19.8	80
19.99 - 20.01	Standard Frequency and Time signal	21.0 - 21.45	97	21.45 - 21.85	73
21.924 - 22	87	22.0 - 22.855	80	23.2 - 23.35	Aeronautical Mobile
24.89 - 24.99	97	24.99 - 25.01	Standard Frequency and Time signal	25.33 - 25.55	Fixed Mobile
25.55 - 25.67	Radio Astronomy	25.67 - 26.1	73, 74	26.1 - 26.175	74, 80
26.175 - 26.2	74	26.42 - 26.48	74	26.48 - 26.95	Fixed Mobile
26.95 - 26.96	18	26.96 - 27.23	18, 95	27.54 - 28.0	Fixed Mobile
28.0 - 29.7	97	29.8 - 29.89	Fixed	29.89 - 29.91	Fixed Mobile
29.91 - 30	Fixed				

Sincerely



Deanna Zakharia  
 Regulatory Compliance Manager  
 E-mail : Deanna.zakharia@motorolasolutions.com