



November 12, 2019

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

RE: Justification for Use of Extended Frequencies, XETA4-TMFA, FCC ID: PEJ-938240

To Whom It May Concern:

The XETA4-TMFA has been tested for operation in the 450-470 MHz frequency band under the Private Land Mobile regulations in 47 CFR 90. However, authorized operation in this frequency band is limited to the following frequency sub-bands per 47 CFR § 2.106 in the non-federal U.S. frequency allocation table:

450 – 454 MHz
456 – 462.5375 MHz
462.7375 – 467.5375 MHz
467.7375 – 470 MHz

The XETA4-TMFA is marketed in other regions of the world, including Canada, Mexico, and some South American countries in ITU Region 2, where the entire 450-470 MHz frequency range is allocated for licensed land mobile radio operation.

The XETA4-TMFA was tested at a low channel (450.0xxx MHz), middle channel (460 MHz), and an upper channel (469.9xxx MHz) of the frequency range for common application to the regulatory requirements of the U.S., Canada, and other countries in ITU Region 2. Each of the test frequencies falls within one of the four 47 CFR § 2.106 frequency allocations listed above.

The filing of extended frequencies in the 450-470 MHz frequency band for the XETA4-TMFA is justified based on common testing and marketing of the product in other ITU Region 2 countries per KDB 634817 D01 II(d)(1)(iii).

The XETA4-TMFA is professionally installed and configured for operation in accordance with the licenses granted to the end user. The end user does not configure the operating frequencies. Additionally, the XETA4-TMFA user manual contains specific instructions for operation in the U.S. that reflect the limitation of authorized frequencies to the above frequency ranges, per 47 CFR 90 and 47 CFR § 2.106.

Sincerely,

A handwritten signature in black ink, appearing to read "David Greene", is written over a white background.

David Greene
Senior RF Engineer
XetaWave, LLC