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FEDERAL COMMUNICATIONS COMMISSIONS

Authorization and Evaluation Division

7435 Oakland Mills Road

Columbia, MD 21046

Subject: Extended Frequencies Justification

Dear Sir/Madam,

The Radio with FCC ID: PJ5-RAY70 was designed to operate in the frequency bands 155.5~163.275 MHz

To aid equipment authorization in other countries which accept the United States FCC Grant for Certification, Raymarine UK Limited is requesting that the FCC lists the frequencies 156.025~157.425 MHz, under FCC Rule Part 80 on the FCC Grant.

Raymarine UK Limited Attests that the radio will not be marketed to USA users with the frequency band which is not allowed by the rule part 80.

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. there are only below frequencies can be used:

U.S. Marine VHF Channels and Frequencies

CH.No	TX Freq	RX Freq	Single	Freq Use
01A	156.050	156.050	x	Port Operations and Commercial, VTS. Available only in New Orleans / Lower Mississippi area.
03A	156.150	156.150	x	U.S. Government only
05A	156.250	156.250	x	Port Operations or VTS in the Houston, New Orleans and Seattle areas.
06	156.300	156.300	x	Intership Safety
07A	156.350	156.350	x	Commercial
08	156.400	156.400	x	Commercial (Intership only)
09	156.450	156.450	x	Boater Calling. Commercial and Non-Commercial.
10	156.500	156.500	x	Commercial
11	156.550	156.550	x	Commercial. VTS in selected areas.
12	156.600	156.600	x	Port Operations. VTS in selected areas.
13	156.650	156.650	x	Intership Navigation Safety (Bridge-to-bridge). Ships >20meters in length maintain a listening watch on this channel in US waters. 2, 6
14	156.700	156.700	x	Port Operations. VTS in selected areas.
15	-	156.750	x	Environmental (Receive only). Used by Class 'C' EPIRBs. 3
16	156.800	156.800	x	International Distress, Safety and Calling. Ships required to carry radio, USCG, and most coast stations maintain a listening watch on this channel. 4
17	156.850	156.850	x	State Control 5
18A	156.900	156.900	x	Commercial
19A	156.950	156.950	x	Commercial
20	157.000	161.600		Port Operations (duplex)
20A	157.000	157.000	x	Port Operations
21A	157.050	157.050	x	U.S. Coast Guard only
22A	157.100	157.100	x	Coast Guard Liaison and Maritime Safety Information Broadcasts. Broadcasts announced on channel 16.
23A	157.150	157.150	x	U.S. Coast Guard only
24	157.200	161.800		Public Correspondence (Marine Operator)

25	157.250	161.850		Public Correspondence (Marine Operator)
26	157.300	161.900		Public Correspondence (Marine Operator)
27	157.350	161.950		Public Correspondence (Marine Operator)
28	157.400	162.000		Public Correspondence (Marine Operator)
61A	156.075	156.075	x	U.S. Government only
63A	156.175	156.175	x	Port Operations and Commercial, VTS. Available only in New Orleans / Lower Mississippi area.
64A	156.225	156.225	x	U.S. Coast Guard only
65A	156.275	156.275	x	Port Operations
66A	156.325	156.325	x	Port Operations
67	156.375	156.375	x	Commercial. Used for Bridge-to-bridge communications in lower Mississippi River. Intership only. 6
68	156.425	156.425	x	Non-Commercial
69	156.475	156.475	x	Non-Commercial
71	156.575	156.575	x	Non-Commercial
72	156.625	156.625	x	Non-Commercial (Intership only)
73	156.675	156.675	x	Port Operations
74	156.725	156.725	x	Port Operations
77	156.875	156.875	x	Port Operations (Intership only) 5
78A	156.925	156.925	x	Non-Commercial
79A	156.975	156.975	x	Commercial. Non-Commercial in Great Lakes only.
80A	157.025	157.025	x	Commercial. Non-Commercial in Great Lakes only
81A	157.075	157.075	x	U.S. Government only – Environmental protection operations.
82A	157.125	157.125	x	U.S. Government only
83A	157.175	157.175	x	U.S. Coast Guard only
84	157.225	161.825		Public Correspondence (Marine Operator)
85	157.275	161.875		Public Correspondence (Marine Operator)
86	157.325	161.925		Public Correspondence (Marine Operator)
87	157.375	161.975		Public Correspondence Marine Operator)
88	157.425	162.025		Public Correspondence only near Canadian border
88A	157.425	157.425	x	Commercial, Intership only

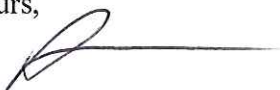
- Recreational boaters normally use channels listed as Non-Commercial: 68, 69, 71, 72, 78A.
- Channel 70 is used exclusively for Digital Selective Calling (DSC) and is not available for regular voice communications.
- Channels 75 and 76 are reserved as guard bands for Channel 16 and are not available for regular voice communications.

Notes:

1. The letter "A" following a channel number indicates simplex use of the ship station transmit side of an international semi-duplex channel. Operations are different from that of international operations on that channel.
2. Channel 13 should be used to contact a ship when there is danger of collision. All ships of length 20meters or greater are required to guard VHF channel 13, in addition to VHF channel 16, when operating within U.S. territorial waters.
3. Channel 15 is Receive Only
4. Channel 16 is used for calling other stations or for distress alerting.
5. Output power is fixed at 1 watt only.
6. Output power is initially set to 1 watt. User can temporarily override this restriction to transmit at high power.

Also, equipment programming is the responsibility of Authorized Service Personnel, the radio complies with 47 CFR Part 80, in that the operator cannot directly program the transmit frequencies using the normally accessible external controls.

Sincerely Yours,



Signature:
 Andrew Little
 Compliance Manager