

Justification Letter

June 18, 2008

Federal Communications Commission
 Authorization & Evaluation Division
 7435 Oakland Mills Road
 Colombia, Maryland 21046

FCC ID: Q5EP1820001

Dear Sir/Madam,

Kirisun understands the following Part 90 VHF spectrum, and would like the FCC to certify the entire 136 to 174 MHz spectrum to include the part 90 extended frequencies. 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 manufactures 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 requirements stated in the Department of Interiors Narrowband Digital Radio Contract.

Part 90 "extended" frequencies.

136-137 MHz- Part 87

137-138 MHz- Part 25

144-148 MHz- Part 97

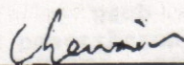
148-150.05 MHz- Part 25

156.2475-157.0375MHz- Part 87

161.575-161.625 MHz- Part 22 and 80

161.625-161.775- Part 22 and 74

Sincerely,



Chenxin Manager
 Kirisun Electronics (Shenzhen) Co., Ltd.