

Nazman NZ Ltd.

September 11, 2007

Equipment Authorization Division
Office of Engineering and Technology
Federal Communications Commission

Industrial Canada Certificate Bureau

Ref: FCC ID: RAYLHR20US, IC: 4697A0-LHR20U Label Justification

Dear Sirs:

The applicant requests acceptance of the labeling proposal described below for transmitters bearing FCC identifier RAYLHR20US.

The subject transmitters are handheld marine radio lower power radio models as shown in "external photos" exhibit authorized under 47CFR Pt 80.

Because the majority of the transmitters housing is composed of touching area, LCD display, and a removable battery pack, there is extremely limited space available to attach the required label carrying the FCC identifier. Attaching the label to the battery pack is not acceptable because the battery pack is a removable item. For this reason, we proposes placing the label carrying the FCC identifier inside the battery compartment as shown in "ID Label Proposed Location" exhibit.

The consumer packaging for these models includes the battery pack as a separate item, NOT installed on the radio. As such, the FCC identifier will be readily visible to the user before the battery pack is installed and whenever the battery pack is removed or replaced. In this location, the label will also be protected from physical abuse and remain readable for the anticipated life of the device.

The consumer packaging for these models is a "carbon box" which does not allow the transmitters to be seen at time of purchase. In order to meet the requirements of 47CFR Part 2.925 (d), we will add the FCC identifier "RAYLHR20US" and IC:4697A-LHR20U to the outside of the consumer "carbon box" packaging.

Sincerely,

Don Korte
On behalf of Navman NZ Ltd.