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Ref:

Re: STZSRP9170UW: Extended Frequency Justification

29 October 2012

Dear Sir/ Madam,

ComGroup Australia would like to submit the following justification to show the frequency range as 440 – 512 MHz on the Grant of Equipment Authorization for STZSRP9170UW portable radiocommunications transceiver.

This frequency range is applicable to FCC Part 90 radiocommunication systems that would include public agencies, emergency services, commercial, business and industrial services etc. These services account for the majority of users on this band.

Also the frequency of operation of the STZSRP9170UW radio cannot be programmed by the operator to transmit on frequencies other than those programmed by service or maintenance personnel. From the FCC KDB634187 guide, it is noted that FCC rules would be violated if the STZSRP9170UW equipment were programmed and operated on unauthorized frequencies.

Sincerely,

R. Starr 11

Robert Stowell

Senior Engineer