

Shanghai Huace Navigation Technology LTD.

**Office of Engineering and Technology
Laboratory Division
Equipment Authorization Branch
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046**

Subject: Extend Frequencies Justification Original Application FCC ID: SY4-A01013

**Company: Shanghai Huace Navigation Technology LTD.
Address: Building D, 599 Gaojing Road, Qingpu District, Shanghai, China**

Dear Sir or Madam;

This Digital radio was designed to operate in the frequency bands 410-470MHz; To aid equipment authorization in other countries that accepts the United States FCC Grant for Certification, Shanghai Huace Navigation Technology LTD. Is requesting that the FCC list the frequencies 410-470MHz under FCC Rule Parts 90 and the Grant note code "EF".

For the FCC's Rule Part 90 applications, this radio is used in systems by Federal and Public Safety agencies including Police, Fire, and Emergency Medical Services, etc. as indicated in the table below. Equipment programming is the responsibility of Authorized Service Personal. Also, the radio complies with 47 CFR Part 90.203 (e), in that the operator cannot directly program the transmit frequencies using the normally accessible external controls.

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.

| Frequency Range (MHz) | Part 22 | Part 74 | Part 80 | Part 90 | Federal |
|-----------------------|---------|---------|---------|---------|---------|
| 410-450 | | | | X | |
| 450-454 | | X | | X | |
| 454-456 | | X | | | |
| 456-460 | X | | X | X | |
| 460-462.5375 | | | | X | |
| 462.5375-462.7375* | | | | | X |
| 462.7375-467.5375 | | | X | X | |
| 467.5375-467.7375 | | | X | | |
| 467.7375-470 | | | X | X | |

Please contact me if you require any additional information.

Shanghai Huace Navigation Technology LTD.

Signature: Chu Sheng **Date:** 2018-11-30

Name: Chu Sheng

Title: Engineer

Company: Shanghai Huace Navigation Technology LTD.