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-A02045

Company: Shanghai Huace Navigation Technology Ltd.

Address: 577 Songying Road, Qingpu District, 201706 Shanghai, China

Dear Sir or Madam;

We, **Shanghai Huace Navigation Technology Ltd.** declares that the Digital radio meets 47CFR Section 90.203(j)(4) and 90.203(j)(5) spectrum efficiency requirement; This Digital radio is support both 12.5 KHz and 25 KHz for GMSK (digital modulation; Emission Designator: G7D for data modes, also this Digital radio designed in accordance with ETSI TS 102 361-1 requirement, will at least support 9600 bits per second in a 12.5 KHz channel bandwidth in a 12.5 KHz channel bandwidth and 19200 bits per second in a 25 KHz channel bandwidth, GMSK will refer 2 time slots in one 12.5 KHz bandwidth and refer 4 time slots in one 25 KHz bandwidth accordance to ETSI ETS 102 361-1, which equal with 9600/2 = 4800 and 19200/4 = 4800 bits per second in one 6.25 KHz channel bandwidth;

We, **Shanghai Huace Navigation Technology Ltd.** declares that the Digital radio capable of operating on the nationwide public safety interoperability calling channel (433.00 MHz), meets 47CFR Section 90.203(j)(1) requirement;

Signature:	Glenn Chu	Date:	2023-09-07
Name:	Glenn Chu		
Title:	Certification Manager		
Company:	Shanghai Huace Navigation Technology LTD.		