

ABELL INDUSTRIES CO., LTD.

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Justification Letter

Date: 2019-09-20

FEDERAL COMMUNICATIONS COMMISSION

Authorization and Evaluation Division

7435 Oakland Mills Road

Columbia, MD 21046

FCC ID: TEYR-80

Model number: R-80

Dear Sir/Madam,

We, **ABELL INDUSTRIES CO., LTD.**, acknowledge that this device will not be marketed to USA users with the frequency band which is not allowed by rule part 90. and it is a violation of FCC rules if this device is operated on unauthorized frequencies inside the U.S.A.

This equipment meets the requirements of the FCC Rules, Parts 90.203(e) and (g), as applicable. Programming of this products transmit frequencies can be performed ONLY by the manufacturer or by service or by maintenance personal.

The operator can't program transmit frequencies using the equipment's external operation controls. This is to certify that the requirements of 47 CFR Part 90.203(j)(4) and (5) spectrum efficiency are met by the **ABELL INDUSTRIES CO., LTD.** as demonstrated by the tests conducted on the sample radio provided.

The tests show that the 4FSK data rate is in accordance with ETSI TS 102 361-1, that is 9600 bits per second in a 12.5 kHz bandwidth to satisfy the data rate requirement of 4800 bits per second per 6.25 kHz of channel bandwidth (7K60F1D emissions). Additionally the **Digital repeater** uses the AMBE+2 half-rate vocoder to compress 60 ms of normal bursts are sent in alternate 30 ms TDMA slots and so comply with the equivalence of one voice channel per 6.25 kHz bandwidth (7K60F1E emission). Additionally the radio also meets the requirement of one voice channel per 12.5 kHz of channel bandwidth for analogue speech (11k0F3E emission).

Sincerely Yours,

Signature:

Wangbo

R&D Director

