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14th October 2104

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Extended Frequencies Justification

Gentlemen:

The TXJCM1039V was designed to operate in the frequency bands 136.0-174.0 MHz.

To aid equipment authorization in other countries that accept the United States FCC Grant of Certification, this will serve as a request that the FCC list the frequencies of 136.0-174.0 MHz under the FCC Rules **Part 90** as listed in the table below & the 731 form on the FCC Grant.

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. Additionally, it will be used in other countries that accept the FCC Grant of Equipment Authorization. These services account for a majority of users as described in the below table.

FREQUENCY RANGE (MHZ)	Rule Part	Non-Federal	ITU Region
136.0-150.8		X	1, 2, 3
150.8-156.2475	90		
156.2475-157.1875		X	1, 2, 3
157.1875-161.575	90		
161.575-161.775		X	1, 2, 3
161.775-161.9625	90		
161.9625-162.0375		x	1, 2, 3
162.0375-174.0	90		

Equipment programming is the responsibility of Authorized Service Personnel only. In addition, 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.

Kevan Wilson-Elswood
Technical Compliance Manager