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May 18, 2011  
Timco Engineering, Inc.  
849 NW State Road 45  
P.O. Box 370  
Newberry, Florida 32669

**Subject: FCC ID justification letter for expanded frequency range 400 - 470 MHz**

Gentlemen;

The XM-4000A radio was designed to operate in the frequency bands 400 - 470 MHz

To aid equipment authorization in other countries that accept the United States FCC Grant for Certification, Yeonhwa M Tech is requesting that the FCC list the frequencies 400 - 470 MHz under FCC Rule Parts 90 on the FCC Grant.

For the FCC's Rule Parts 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.

Frequency Range (MHz)	Part 90	Part 22	Part 74	Part 80	Federal	Grant Notes
400-406					X	EF, BE
406.1 – 410.0	X				X	EF, BE
410 – 420	X				X	EF, BE
450 – 454	X		X			EF, BE
454 – 455		X		X		EF, BE
455 - 456			X			EF, BE
456 – 460	X	X		X		EF, BE
460 – 462.5375	X					EF, BE
462.7375 - 470	X					EF, BE

Equipment programming is the responsibility of Authorized Service Personnel. 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.

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.

Truly yours,  
Sincerely,

**Hwan-Dae Kim / Chief Engineer**  
**Yeonhwa M Tech Co., Ltd.**