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## Justification Letter

Date: 2017-10-27

Federal Communications Commission  
Authorization & Evaluation Division  
7435 Oakland Mills Road  
Colombia, Maryland 21046

Subject: Extended Frequencies Justification for Certification of Transmitter with  
FCC ID: XBPAT-D5

Dear Sir/Madam,

The transmitter was designed to operate in the frequency bands 400-470MHz.  
To aid equipment authorization in other countries which accept the United States FCC Grant for certification, Fujian Nanan Quansheng Electronics Co., Ltd. is requesting that the FCC lists the frequencies 400-470MHz, under FCC Rules Parts 90 on the FCC Grant.

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 Personnel. Also, the radio complies with 47 CFR Part 90.203(e), in that the operator can not directly program the transmit frequencies using the normally accessible external controls.

Fujian Nanan Quansheng Electronics Co., Ltd. attests that the repeater will not be marketed to USA users with the frequency band which is not allowed by the rule part 90.

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)	FCC Rule Part
400-406 MHz	For Federal
406.1-450 MHz	FCC Part 90
450-454 MHz	FCC Part 90
456-460MHz	FCC Part 90
460-462.5375MHz	FCC Part 90
462.7375-467.5375MHz	FCC Part 90
467.7357-470MHz	FCC Part 90

Sincerely,

Signature: Feili Chen

Print name: FEILI, CHEN

Title: Manager