SHENZHEN COVALUE COMMUNICATIONS CO., LTD. ADD: 2/F., Bldg. 24, XiLi Industrial Park, No.119 Xinguang Rd, Xili, Nanshan Shenzhen China TEL: +86-0755-86345789 FAX: +86-0755-86345790 Email: sct@covalue.cn

Date:2019-12-25 FEDERAL COMMUNICATIONS COMMISSIONS Authorization and Evaluation Division 7435 Oakland Mills Road Columbia, MD 21046

Subject: Extended Frequencies Justification for Certification of Transmitter with FCC ID: Y4GDR5810-1

Dear Sir/Madam,

This transmitter was designed to operate in following frequency ranges: 136-174MHz To aid equipment authorization in other countries which accept the United States FCC Grant for Certification, SHENZHEN COVALUE COMMUNICATIONS CO., LTD. is requesting that the FCC lists the frequencies 136-174MHz, under FCC Rule Parts 22 and 90 on the FCC Grant.

SHENZHEN COVALUE COMMUNICATIONS CO., LTD. attests that the Two Way Radio will not be marketed to USA users with the frequency band which is not allowed by the rule Parts 22 and 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
136-150.8	For Federal
150.8-152.855	FCC Part 22/ FCC Part 90
152.855-154	FCC Part 90
154-156.2475	FCC Part 90
157.1875-157.45	FCC Part 90
157.45-161.575	FCC Part 22/FCC Part 90
161.575-161.625	FCC Part 22
161.625-161.775	FCC Part 22
161.775-161.9625	FCC Part 90
162.0375-173.2	FCC Part 90
173.2-173.4	FCC Part 90
173.4-174	For Federal

Also, equipment programming is the responsibility of Authorized Service Personnel, the Two Way 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.

Please contact me if you require any additional information. Sincerely Yours,

Signature:

Changtao Shu

Chengtao Shu Engineer