Data: June 12, 2013
Applicant: Elbit Systems Land and C4I Ltd.
Product: MF/HF transceiver
Model: Micom Z Dash
FCC ID: YO5MICOM-DS125W

To Whom It May Concern

Subject: Justification Letter

Dear Sir/Madam:

Elbit Systems Land and C4I Ltd. understands the following CFR 47 Part 90 MF/HF spectrum, and would like the FCC to certify the entire 1.6 MHz to 29.9999 MHz spectrum to include the CFR 47 Part 80 extended frequencies.

This would be done to facilitate the requirements of agencies covered under NTIA spectrum usage. Government agencies complying with the NTIA instead of the FCC must purchase their equipment from private industry manufacturers who are governed under FCC rules. The conflict in spectrum allocation detracts from the options available to the government agencies for commercial off the shelf equipment which meets their required specifications such as the Department of Interiors.

The following table lists the CFR 47 Part 90 frequencies for a MF/HF mobile transceiver:

1.6 – 1.8 MHz	5.06 – 5.45 MHz	13.41 – 13.57 MHz	21.85 – 21.924 MHz 1.9 – 2.0 MHz
13.87 – 14.0 MHz	22.855 – 23.2 MHz 2.107 – 2.17 MHz	6.765 – 7.0 MHz	14.35 – 14.99 MHz
24.89 MHz 2.194 – 2.495	MHz 7.3 – 7.4 MHz	15.8 – 16.36 MHz	25.01 – 25.07 MHz 2.505 – 2.85
7.4 – 8.1 MHz	17.41 – 17.48 MHz	25.07 – 25.21 MHz 3.155 – 3.23 MHz	9.04 – 9.4 MHz
MHz 25.21 – 25.33	MHz 3.23 – 3.4 MHz	9.9 – 9.995 MHz	18.168 – 18.78 MHz 27.23 – 27.4
4.438 – 4.65 MHz	10.15 – 11.175 MHz	19.02 – 19.68 MHz	27.41 – 27.54 MHz 4.75 – 4.85 MHz
11.6 MHz 19.8 –	19.99 MHz 29.7 – 29.8 MHz		
5.005 – 5.06 MHz	12.1 – 12.23 MHz	20.01 – 21.0 MHz	

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The CFR 47 Part 90 “extended" frequencies are:

1.8 – 1.9 MHz	Part 97	13.57 – 13.87 MHz	Part 73
2.0 – 2.107 MHz	Part 80	14.0 – 14.35 MHz	Part 97
2.17 – 2.1735 MHz	Part 80	14.99 – 15.01 MHz	Standard Frequency and Time signal
2.1735 – 2.1905 MHz	Part 80 0r 87	15.01 – 15.1 MHz	Aeronautical Mobile
2.1905 – 2.194 MHz	Part 80	15.1 – 15.8 MHz	Part 73
2.495 – 2.505 MHz	Standard Frequency and Time signal	16.36 – 17.41 MHz	Part 80
2.85 – 3.025 MHz	Part 87	17.48 – 17.9 MHz	Part 73
3.025 – 3.155 MHz	Aeronautical Mobile	17.9 – 17.97 MHz	Part 87
4.995 – 5.005 MHz	Standard Frequency and signal	17.97 – 18.03 MHz	Aeronautical Mobile
5.45 – 5.68 MHz	Part 87	18.068 – 18.168 MHz	Part 97
5.68 – 5.73 MHz	Aeronautical Mobile	18.78 – 18.9 MHz	Part 80
5.9 – 6.2 MHz	Part 73	18.9 – 19.02 MHz	Part 73
6.2 – 6.525 MHz	Part 80	19.68 – 19.8 MHz	Part 80
6.525 – 6.685 MHz	Part 87	19.99 – 20.01 MHz	Standard Frequency and Time signal
6.685 – 6.765 MHz	Aeronautical Mobile	21.0 – 21.45 MHz	Part 97
7.1 – 7.1 MHz	Part 97	21.45 – 21.85 MHz	Part 73
7.1 – 7.3 MHz	Part 73 or 97	21.924 – 22.0 MHz	Part 87
8.1 – 8.195 MHz	Part 80	22.0 – 22.855 MHz	Part 80
8.195 – 8.815 MHz	Part 80 or 87	23.2 – 23.35 MHz	Aeronautical Mobile
8.815 – 8.965 MHz	Part 87	24.89 – 24.99 MHz	Part 97
8.965 – 9.04 MHz	Aeronautical Mobile	24.99 – 25.01 MHz	Standard Frequency and signal
9.4 – 9.9 MHz	Part 73	25.55 – 25.67 MHz	Radio Astronomy
9.995 – 10.005 MHz	Standard Frequency and signal	25.67 – 26.1 MHz	Part 73 or 74
10.005 – 10.1 MHz	Part 87	26.1 – 26.175 MHz	Part 74 or 80
10.1 – 10.15 MHz	Part 97	26.176 – 26.48 MHz	Part 74
11.175 – 11.275 MHz	Aeronautical Mobile	26.48 – 26.95 MHz	Fixed Mobile
11.275 – 11.4 MHz	Part 87	26.95 – 26.96 MHz	Part 18

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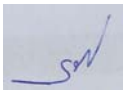
11.6 – 12.1 MHz	Part 73	26.96 – 27.23 MHz	Part 18 or 95
12.23 – 13.2 MHz	Part 80	27.54 – 28.0 MHz	Fixed Mobile
13.2 – 13.26 MHz	Aeronautical Mobile	28.0 – 29.7 MHz	Part 97
13.26 – 13.36 MHz	Part 87	29.8 – 30.0 MHz	Fixed Mobile
13.36 – 13.41 MHz	Radio Astronomy		

Sincerely,



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Ben David Maoz, Product Manager

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