

Bullitt Group

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1

June 13, 2011

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

Subject: FCC ID: ZL5TP851 justification letter for expanded frequency range 406.1 - 480MHz

Gentlemen:

The TP851 Portable radio was designed to operate in the frequency bands 406.1-480MHz

To aid equipment authorization in other countries that accept the United States FCC Grant for Certification, Bullitt Gourp is requesting that the FCC list the frequencies 406.1-480MHz under FCC Rules 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. 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.

Frequency Range (MHz)	Part 90	Feds	Grant Notes	Emission Designators (Rule Part 90)
406.1-454	X		EF	11K0F3E
454-456		X	EF	11K0F3E
456-460	X		EF	11K0F3E
460-462.5375	X		EF	11K0F3E
462.5375-462.7375		X	EF	11K0F3E
462.7375-467.5375	X		EF	11K0F3E
467.5375-467.7375		X	EF	11K0F3E
467.7375-470	X		EF	11K0F3E
470-480	X		EF	11K0F3E

Sincerely,

Bullitt Group



Richard Wharton
CEO