

December 16<sup>th</sup>, 2013

Office of Engineering and Technology  
Laboratory Division  
Equipment Authorization Branch  
7435 Oakland Mills Road  
Columbia, MD 21046

Att: Tim Harrington

Subject: Response to Correspondence Number 43846 for Certification of Transmitter with  
FCC ID: AZ489FT3829, EA449420, May 17, 2013

Dear Mr. Harrington,

Please see below for our responses:

Q1) In general our assessment is that the original certification under this FCC ID addressed 90.203(e) and 90.427(b) compliance primarily under 90.203(g)(3) provisions, whereas this permissive change application is proposing rather a scheme relying primarily on 90.203(g)(2) provisions to control operator access. Based on info at hand the approach in this filing does not seem to ensure 90.203(e) compliance. Unless already done, it may be appropriate for applicant to contact FCC WTB and FCC PSHSB and providing details to confirm acceptability of the proposed approach, and then advise herein pending the outcome.

Note also considering that the original filing under this FCC ID indicated part 80 operations, other or different considerations and/or bureau co-ordinations might be needed to address compliance for 80.203(b) device programming rules.

**Response:**

Motorola Solutions contacted Scot Stone of the FCC's WTB and Michael Wilhelm of the PSHSB on August, 2013. The FCC's official position is that utilizing only a password to enable FPP does meet the spirit of the FCC's rules, provided it is "legitimate" password protection. In our discussion, he explained that they don't expect the password to be a simple default for all devices, which never has to be changed, so that 2 minutes on Google could allow anyone to enable FPP.

The FCC did not proscribe how it needed to be done, but gave examples such as forcing a default password to be changed when the device is initially programmed, or somehow making the passwords unique on a customer by customer, or even device by device, basis, although the last may be impractical. These are just examples with lots of flexibility to define a process that fits with both our product teams' and our customers' needs.

Scot also indicated that this has been discussed between the Wireless and Public Safety bureaus, as well as OET, so they are all on the same page.

Based on the above opinion and guidance from the WTB and the PSHSB, Motorola Solutions will be implementing FPP by eliminating the need for a dongle for FCC users as follows:

- 1) Radios purchased by non-federal agencies from Motorola Solutions would order a radio with an FPP option. This option would include the following

- Advanced System Key (external device and control normally inaccessible to the operator) which would be used for enabling FPP on the radio through the use of a computer (external device)
  - Motorola would restrict the enablement of the FPP feature through the programming software to service or maintenance personnel by use of the Advanced System Key
  - Customer Programming Software (CPS)
- 2) The customer would receive the radios and connect the radios to a computer (external device)
  - 3) The CPS (control normally inaccessible to the operator) would read the radio configuration
  - 4) The customer would load the Advanced System Key
  - 5) The FPP feature would then become available through the CPS with the presence of the Advanced System Key
  - 6) The authorized service/maintenance personnel would be the only persons with access to enable the FPP feature
  - 7) The CPS would then require the authorized service/maintenance personnel to enter a password (not the FPP Password it's only a password to access CPS to turn on the features such as FPP) that the authorized service/maintenance personnel would use on the subscriber when that person was to operate the FPP feature
  - 8) A menu item or button selection would be added to the subscriber's programming by the authorized service/maintenance personnel that would be used to access the FPP feature on the subscriber
  - 9) The radio would be written and programmed with this password
  - 10) In order to use FPP, the service/maintenance personnel would need to access the menu item or button, enter the password that the authorized service/maintenance personnel set, and at that point the authorized service/maintenance personnel would be able to use the FPP feature.

For Rule Part 80, FPP is a feature that is being offered in accordance with the requirements for 80.203(b) for operations in the 156-162 MHz.

If you require any additional information, please contact me at (954) 723-5793 (Phone).

Sincerely,



FCC ID: AZ489FT3829

*Mike Ramnath*

Mike Ramnath (signed above)  
Manager, Regulatory Compliance  
Email: [Mike.Ramnath@motorolasolutions.com](mailto:Mike.Ramnath@motorolasolutions.com)