

SPOK Aus Pty. Ltd.  
130 Main Street, Osborne Park, Perth 6017  
Western Australia, Australia  
Ph: +61 8 6240 0000  
Email: Clinton.Cambridge@spok.com

November 18, 2014  
Office of Engineering and Technology  
Laboratory Division  
Equipment Authorization Branch  
FCC Laboratory 7435 Oakland Mills Rd.  
Columbia, MD 21046

Re: Extended Frequency Justification on FCC ID: 2ADHF- INTELPAGE

To whom it may concern:

The Intelpage High Power 25W was designed to operate in the frequency band 450-470 MHz. To aid equipment authorization in other services/countries which accept the United States FCC Grant for certification, but which are not governed by the FCC, SPOK is requesting that the FCC list the frequencies 450-470 MHz under FCC Rule Parts 90 on the FCC Grant. This is being requested to facilitate the requirements of agencies covered under NTIA spectrum usage. Government agencies complying with the NTIA instead of the FCC and other countries must purchase their equipment from private industry manufacturers who are governed under the FCC rules. This 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 requirements stated in the Department of Interior's narrowband Digital Radio Contract.

Per the FCC's KDB634817 guidance, "as an alternative to listing the exact frequencies, we acknowledge that it is a violation of the FCC Rules if this device operates on unauthorized frequencies." Also, per FCC Rules Parts 90.203(e) and (g), programming of transmitter frequencies can only be performed by the manufacturer or authorized service and maintenance personnel.

Frequency Range (MHz)	Part 90	Other
450-454	x	
454-456		x
456-452.5375	x	
462.5375-462.7375		x
462.7375-467.5375	x	
467.5375-467.7375		x
467.7375-470	x	

Sincerely,



Clinton Cambridge  
Manager  
SPOK Aus Pty. Ltd.  
Email: Clinton.Cambridge@spok.com