

Date: November 5, 2019

To Whom It May Concern

Subject: Justification Letter

Applicant: Icom Incorporated
 Product: Marine transceiver
 Model: IC-M803
 FCC ID: AFJ410000

Dear Sir/Madam

Icom understands the following Part 90 MF/HF spectrum, and would like the FCC to certify the entire 1.6 to 29.9999MHz spectrum to include the part 90 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.

Following table is FCC part 90 frequencies for 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	5.73 – 5.9 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	23.35 – 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 MHz	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	18.03 – 18.068 MHz	25.21 – 25.33 MHz
3.23 – 3.4 MHz	9.9 – 9.995 MHz	18.168 – 18.78 MHz	27.23 – 27.41 MHz
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	11.4 – 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	

Part 90 "extended" frequencies are:

1.8 – 1.9 MHz	Part 97
2.0 – 2.107 MHz	Part 80
2.17 – 2.1735 MHz	Part 80
2.1735 – 21905 MHz	Part 80 or 87
2.1905 – 2.194 MHz	Part 80
2.495 – 2.505MHz	Standard Frequency and Time signal
2.85 – 3.025 MHz	Part 87
3.025 – 3.155 MHz	Aeronautical Mobile
4.995 – 5.005MHz	Standard Frequency and Time signal
5.45 – 5.68 MHz	Part 87
5.68 – 5.73 MHz	Aeronautical Mobile
5.9 – 6.2 MHz	Part 73
6.2 – 6.525 MHz	Part 80

6.525 – 6.685 MHz	Part 87
6.685 – 6.765 MHz	Aeronautical Mobile
7.0 – 7.1 MHz	Part 97
7.1 – 7.3 MHz	Part 73 or 97
8.1 – 8.195 MHz	Part 80
8.195 – 8.815 MHz	Part 80 or 87
8.815 – 8.965 MHz	Part 87
8.965 – 9.04 MHz	Aeronautical Mobile
9.4 – 9.9 MHz	Part 73
9.995 – 10.005 MHz	Standard Frequency and Time signal
10.005 – 10.1 MHz	Part 87
10.1 – 10.15 MHz	Part 97
11.175 – 11.275 MHz	Aeronautical Mobile
11.275 – 11.4 MHz	Part 87
11.6 – 12.1 MHz	Part 73
12.23 – 13.2 MHz	Part 80
13.2 – 13.26 MHz	Aeronautical Mobile
13.26 – 13.36 MHz	Part 87
13.36 – 13.41 MHz	Radio Astronomy
13.57 – 13.87 MHz	Part 73
14.0 – 14.35 MHz	Part 97
14.99 – 15.01 MHz	Standard Frequency and Time signal
15.01 – 15.1 MHz	Aeronautical Mobile
15.1 – 15.8 MHz	Part 73
16.36 – 17.41 MHz	Part 80
17.48 – 17.9 MHz	Part 73
17.9 – 17.97 MHz	Part 87
17.97 – 18.03 MHz	Aeronautical Mobile
18.068 – 18.168 MHz	Part 97
18.78 – 18.9 MHz	Part 80
18.9 – 19.02 MHz	Part 73
19.68 – 19.8 MHz	Part 80
19.99 – 20.01 MHz	Standard Frequency and Time signal
21.0 – 21.45 MHz	Part 97
21.45 – 21.85 MHz	Part 73
21.924 – 22.0 MHz	Part 87
22.0 – 22.855 MHz	Part 80
23.2 – 23.35 MHz	Aeronautical Mobile
24.89 – 24.99 MHz	Part 97
24.99 – 25.01 MHz	Standard Frequency and Time signal
25.55 – 25.67 MHz	Radio Astronomy
25.67 – 26.1 MHz	Part 73 or 74
26.1 – 26.175 MHz	Part 74 or 80
26.176 – 26.48 MHz	Part 74
26.48 – 26.95 MHz	Fixed Mobile
26.95 – 26.96 MHz	Part 18



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26.96 – 27.23 MHz Part 18 or 95

27.54 – 28.0 MHz Fixed Mobile

28.0 – 29.7 MHz Part 97

29.8 – 30.0 MHz Fixed Mobile

Sincerely,

Icom Incorporated

Atsushi Tomiyama
General Manager of Quality Department

A handwritten signature in black ink, appearing to read 'A. Tomiyama', with a large, stylized initial 'A'.