



14th March 2002

Mr. Andy Leimer
Authorization & Evaluation Division
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Re: Form 731 Confirmation Number: EA490937 with FCC ID: AZ489FT4853.

Dear Mr. Leimer;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its response to the 13th March 2002 request for information in Correspondence Number 22302.

Q1: The User's Manual mentions Data Operation. The User's manual or Operational Description does not provide any further information on Data Operation. Part 95 prohibits data transmission. Please explain.

R1: The T7200 Users Manual contains Motorola's standard safety template for consumer wireless devices (contained in "Safety and General Information"). This section makes reference to data operation to ensure a consistent and common statement to Motorola's consumers. The T7200 radio is designed to Part 95 and does not have any data transmission capability. Therefore there are no references to data operation in the operational section of the User's Manual.

Q2: The GMRS/FRS policy set forth by the Wireless Bureau states "except for the power, the technical parameters for operating on all the channels (both FRS and GMRS) must be the same as those for FRS (e.g., 12.5 kHz bandwidth, 2.5 ppm frequency tolerance, etc)." This device appears to be non-compliant with this policy since there is a user selectable 16 kHz BW used for the GMRS repeater. In addition there appears to be nothing to prevent FRS transmission with this BW.

R2: Motorola has designed and developed the T7200 radio to be compliant with all Part 95A specifications for GMRS frequencies and all Part 95B specifications for FRS frequencies. A radio that configures itself to operate in conformance with GMRS technical standards when operating on GMRS-only frequencies is fully compliant with FCC rules. The radio's performance on GMRS-only frequencies will have no impact on FRS-only radios.

The T7200 is marketed as a GMRS radio that provides additional compatibility to FRS channels 8 to 14. The GMRS installed base is predominately a 25kHz market, and as such Motorola believes communications compatibility is key to the consumer acceptance of the product. The majority of existing GMRS repeater stations operate using 25kHz bandwidth. Motorola believes that handheld device operation on these frequencies limited to 12.5kHz only would lead to consumer dissatisfaction with the audio performance and operating range. We do not believe that this violates the intent of the Wireless Bureau's informal policy.

The T7200 provides the capability to select operation on either 12.5 or 25kHz bandwidth as permitted on GMRS (Part 95A) Channels. This capability also exists on Channel 1 to 7 that

are shared with the FRS service. Providing users the ability to select bandwidth on Channels 1 to 7 allows consumers the greatest flexibility to communicate with both legacy GMRS and FRS units. We note that the FCC routinely approves GMRS radios that operate on Channels 1 to 7 with 25 kHz bandwidth only. Finally, the default operational bandwidth for all channels is 12.5 kHz. Users must enter the programming mode to change bandwidth to 25 kHz.

With regard to FRS operation, the software within the radio has been specifically developed to eliminate the possibility of the radio user changing operating bandwidth on FRS (Part 95B) Channels 8 to 14. Also, The T7200 operates at a 2.5 ppm frequency tolerance on all operating frequencies in all modes and settings.

Contact me at (954) 723-5793 if you require any additional information.

Regards,

/s/ Mike Ramnath

FCC Liaison

Email: mike.ramnath@motorola.com