

December 1, 2018

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

Subject: Inquiry pertaining to FCC ID: AZ489FT4860; Correspondence Reference Number: 423341

Dear Sir/Madam,

Motorola Solutions Inc herein submits the following response to the questions asked:

For the first **Section I**:

The first part is what was provided in the correspondence.

The parts in **blue, bold font** are copied from the CFR (more complete than info provided).

Then Motorola Solutions, Inc response.

#### **Section I**

a) 90.203(e) (operators are precluded from programming and transmitting using the equipment's external operation controls on frequencies other than any programmed by the manufacturer or service or maintenance personnel); **90.203(e) Except as provided in paragraph (g) of this section, transmitters designed to operate above 25 MHz shall not be certified for use under this part if the operator can program and transmit on frequencies, other than those programmed by the manufacturer, service or maintenance personnel, using the equipment's external operation controls.**

a) 90.203(e)Response:

<Motorola Solution, Inc> *Our device is not excluded from certification under 90.203(e) since the operator **cannot** program and transmit on frequencies other than those programmed by the manufacturer, service or maintenance personnel using the equipment's external controls.*

b) 90.203(g)(1) (procedures for making configuration modifications and altering transmit frequencies not available with operating information normally supplied to device end users);

90.203(g)(3) (external devices or specifically programmed modules for device frequency programming are available only to service/maintenance personnel);

**90.203(g) Transmitters having frequency programming capability and that are designed to operate above 25 MHz are exempt from paragraphs (e) and (f) of this section if the design of such transmitters:**

**(1) Is such that transmitters with external controls normally available to the operator must be internally modified to place the equipment in the programmable mode. Further, while in the programmable mode, the equipment shall not be capable of transmitting. The procedures for making the modification and altering the frequency program shall not be made available with the operating information normally supplied to the end user of the equipment; or**

**(2) Requires the transmitter to be programmed for frequencies through controls normally inaccessible to the operator; or**

**(3) Requires equipment to be programmed for frequencies through use of external devices or specifically programmed modules made available only to service/maintenance personnel; or**

**(4) Requires equipment to be programmed through cloning (copying a program directly from another transmitter) using devices and procedures made available only to service/maintenance personnel.**

b) 90.203(g)Response:

<Motorola Solution, Inc> Our device is not subject to 90.203(g). It would only be so if the operator **could** program and transmit on frequencies other than those programmed by the manufacturer, service or maintenance personnel using the equipment's external controls (exemption to certification limit per 90.203(e)).

c) 90.427(b) (only licensee frequencies can be programmed into device).

**90.427(b) Except for frequencies used in accordance with §90.417, no person shall program into a transmitter frequencies for which the licensee using the transmitter is not authorized.**

c) 90.427(b) Response:

<Motorola Solution, Inc> All of MSI's devices are programmable within a band of frequencies and programming cannot be restricted to only the licensee's authorized frequency by the manufacturer. Programming and license compliance is the responsibility of the service/maintenance personnel and licensee.

## **Section II. PROFESSIONAL INSTALLER AND SERVICE PERSONNEL CONFIGURATION CONTROLS**

Response:

<Motorola Solution, Inc> Service personnel have limited access to configure the device to operate on the licensee's frequency through software that is password controlled. A description of the control procedure that ensures only service personnel have access to this capability can be provided if required.

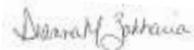
## **Section III. USER CONFIGURATION CONTROL**

Response:

<Motorola Solution, Inc> The end user cannot configure radio frequency performance or parameter controls beyond the feature operations and frequencies pre-programmed by the manufacturer or service/maintenance personnel.

If you require any additional information, please contact me at (954) 723-4707.

Sincerely,



Deanna Zakharia  
Regulatory Compliance Manager  
E-mail: [Deanna.zakharia@motorolasolutions.com](mailto:Deanna.zakharia@motorolasolutions.com)