

November 28<sup>th</sup>, 2012

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

Att: Tim Harrington

Subject: Response to Correspondence 136015 for Certification of Transmitter with  
FCC ID: AZ489FT5850, TC431252

Dear Mr. Harrington,

Please see below for our responses:

Q1) Further to at minimum 2.962(f)(1), 2.962(f)(5)(i), 2.962(c)(4), applications processed by TCBs must be in accordance with FCC rules and policies, i.e. including procedures.

Q1) a) The following was notified to TCBs e.g. Aug. 2010 FCC-TCB call notes, and also notified to applicant, e.g. FCC ID AZ489FT7036, TC 642409, 6/1/2010 corresp. 85799 and 7/1/2010 corresp. 87207.

Note that as of August 30, 2007, narrowband operations in the 700 MHz band were reallocated to the 769-775 MHz and 799-805 MHz segments of the band [see 47 CFR 90.531(b)].

Prior to this reallocation, narrowband channels were located in the 764-767/773-776 MHz and 794-797/803-806 MHz segments.

Thus, as of August 30, 2007, all new or modified 700 MHz narrowband operations by public safety licensees must be operated according to the new band plan unless that licensee was granted waiver relief by the Commission.

Further, any such waiver relief was specifically limited to reported equipment that was already on order and planned for deployment.

Accordingly, no new equipment may be marketed to public safety licensees unless it is licensed and operated in compliance with the current band plan.

In other words, **generally Form-731 line entries must list only FCC allocated and licensable frequencies**, and which may differ from device actual tuning ranges (frequency capabilities), in which case **grant notes and filing contents must clearly identify specific intended frequencies available for FCC station licensing AND whatever frequencies within device capabilities are not available nor intended for FCC-regulated operations.**

For reference, as of 11/14/2012 the relevant 90.531 band definitions are:

758-768 MHz, PS broadband  
768-769 MHz, PS internal guardband  
769-775 MHz, PS narrowband voice  
788-798 MHz, PS broadband

798-799 MHz, PS internal guardband  
799-805 MHz, PS narrowband voice

**TCB please coordinate to revise the form-731 and/or update all associated filing exhibits as appropriate.**

*A1 a) Form 731, Ex12, and Ex13 have been updated, removing non-licensable freq for internal guard band of 768-769 MHz and 798-799 MHz.*

**Q1) b) EMC/radio report includes test data for channels within 768-769 MHz and 798-799 MHz (esp. ACP). Being a guard band, 768-769 MHz and 798-799 MHz generally are not allocated nor licensable.**

<http://reboot.fcc.gov/spectrumdashboard/searchSpectrum.seam>)

47 CFR 2.962 and FCC policy KDB pub 634817 requires applications processed by TCBs to report test data at allocated and licensable frequencies.

KDB pub 634817 D01 v02r04

f. 1. Test only on the allowed frequencies.

f. 2. Test at least one frequency in each band for each rule part applied under and ensure the device is capable of operating on the frequency under each rule part.

This requirement may result in testing on multiple frequencies.

Testing on one frequency may be acceptable if multiple listed bands for a rule part with a continuous frequency range are split to remove a conflict with other rules and the technical requirements in the split bands are the same.

Additional requirements for RF exposure may apply.

*A1 b) 768.0125 MHz and 798.0125 MHz data is "Not for FCC review". The data will be used for Industry Canada filing. However, re-test was done on frequency 764.0125 MHz and 794.0125 MHz to meet the requirement of testing at least one frequency in each band.*

Q2) Per 2.911(b), in addition to the part 2 requirements [2.1033(c)(14), etc], TCB and applicant please ensure for this and ALL future filings that compliance information and test data are submitted for all applicable radio service rules.

Q2) a) Unless it is in the filing already (if yes please say where), and further also to preceding considerations about grant-listed freqs., for devices granted as operating in 763-769 MHz and 793-799 MHz, please amend to address compliance for 90.542(a)(7) requirement of 3 W ERP for 763-768 MHz and 793-798 MHz.

*A2 a) Added 90.542 (a) (7) rules compliance in Ex06A*

Q2) b) Unless it is in the filing already (if yes please say where), please amend to address compliance for the 90.541 first paragraph and 90.545(b)(4) requirement of 3 W ERP for 763-768 MHz and 793-798 MHz.

*A2 b) Added 90.541 and 90.545 (b) (4) rules compliance in Ex06A*

Q2) c) Further also to preceding considerations about grant-listed freqs., regardless of device operating modes, etc., **90.203(p) requires devices granted as operating in 763-769 MHz and 793-799 MHz to show support for 3GPP specs as listed in that rule section; please amend the filing accordingly.**

*A2 c) The transmitter is not supporting 3GPP.*

Q3) We note that some exhibits refer to "adjacent channel coupled power". In general filings need to be consistent with 47 CFR versions in effect at the time of application submission. Further to rulemaking document FCC-02-272, some time ago the rules were changed from: "adjacent channel coupled power" (ACCP) to: "adjacent channel power" (ACP).

Please correct all associated exhibits accordingly for this and all future filings.

*A3) Have updated with "adjacent channel power" (ACP).*

Q4) Especially concerning the 2.911(b) and associated ERP requirements at minimum, TCB please coordinate with applicant to reply herein with resolutions or status no later than 12 pm US eastern time on Nov. 28, 2012, or the application may be subject to other administrative action.

*A4) Updated ERP requirements.*

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

Sincerely,



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

EXHIBIT 13