



22nd October 2009

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

Re: Form 731 Confirmation Number: EA930634 with FCC ID: AZ492FT3821

Dear Mr. Lyles;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida, herein submits its response to the 14th October 2009 for information in Correspondence Number 38169.

Q1) Installation & operating instructions refer to weblink (<http://www.motorola.com/cgiss/index.shtml>) however that weblink re-directs to here, from where next step is unclear (<http://www.motorola.com/staticfiles/Business/US-EN/Government/homepage/index.html>) at least for purposes of this filing and/or to revise instructions exhibit please provide more direct sub-link to where and how to find product specific details beyond the generic and/or outdated link presently listed

R1) RF Safety Booklet was corrected by removing the Weblink. See attachment.

Q2) Operating instructions mentions "FCC type acceptance"; "type acceptance" was renamed to "Certification" circa 1998 - for this and/or future filings please revise instructions exhibit accordingly

R2) The Users manual was updated to remove the words "FCC type acceptance". See attachment.

Q3) install/operating instructions indicate motorcycle mount option - if not in filing already please provide details about operating configuration and explain RF exposure compliance for motorcycle mount use

R3) The User Manual is a multiproduct manual and this 100 Watt radio does not have a Motorcycle option. We do have a 15 Watt option for other FCC applications.

Q4) Op. desc. includes the phrase "Application References -- Pursuant 2.1061" 2.1061 is not in FCC rules - please explain and/or revise accordingly.

R4) We have corrected a typo and replace it with 2.1031

Q5) RF exposure exhibit uses term or abbreviation "EME" but does not appear to define it - please revise accordingly

R5) The MPE report has been revised to add the definition and abbreviation section. This section includes the definition for the abbreviation "EME".

Q6) Please revise RF exposure exhibit to omit data for frequencies not allocated for FCC operations

R6) The front cover of the MPE report has been revised to include the asterisk where part 90 is indicated, applicable frequency range for part 90, and note to indicate that "MPE results outside of part 90 are not applicable for FCC compliance demonstration".

Q7) MPE report Appdx D mentions "rms power" - "rms power" is not applicable for basic FCC part 90 compliance purposes; please revise accordingly In a purely resistive circuit a theoretical "rms power" may be held to be the equivalent heating effect of a DC power and can be deemed to be true power. In a circuit that consists of reactance as well as resistance the apparent power is greater than the true power (the vector difference between true power and apparent power is called reactive power). Unless any measuring system can be completely devoid of reactance then the measured power cannot be considered to be RMS power; it therefore becomes apparent that this parameter would be difficult to measure with any degree of accuracy at RF frequencies.

R7) The MPE report, appendix D has been revised to change the "r.m.s. power" to "average power".

Q8) Please provide a modified version of Fig2 from Appdx D with markups to show dimensional arrows same as shown in Appdx A

R8) Figure 2 of the MPE report, appendix D, has been revised to show dimensional arrows.

This filing has requested Form-731 line-entry including frequencies at which part 90 operations are not licensable, in which case FCC requests applicants to address items per KDB pub. 634817. The filing must have a justification letter for extended frequencies outside of applied rule part. Operation must be justified under 2.807.

For example, Government / Military use or exportation to other countries has been allowed. Justification letter from grantee must indicate marketing plans to ensure USA users, other than those specifically identified, cannot operate device outside bands allowed under the relevant rule parts applied for. fyi here are 2.106 (and part 90) allowed freqs: 136-137 - pt87, no pt90 137-138 - pt25, no pt90 138-144 - no pt90 144-148 - pt97, no pt90 148-150.05 - pt25, no pt90 150.05-150.8 - no pt90 150.8-156.2475 - pt90 156.2475-157.0375 - pt80, pt87, no pt90 157.0375-161.575 - pt90 161.575-161.775 - pt22, pt80, no pt90 161.775-173.4 - pt90 173.4-174 - no pt90

R9) See attached Frequency Justification Letter, Exhibit 13c.

Sincerely,
/s/ Mike Ramnath (signed)
Manager, Regulatory Compliance
Email: Mike.Ramnath@motorola.com