

22<sup>nd</sup> August 2012

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

Subject: Extended Frequencies Justification.

Gentlemen:

The APX2500/APX4500 Mobile 2-Way radio was designed to operate in the frequency band 136-174 MHz.

To aid equipment authorization in other countries which accept the United States FCC Grant for Certification, Motorola Solutions is requesting that the FCC lists the frequencies 136-174 MHz on the FCC Grant.

For the FCC's Rule Parts 90 applications, this radio is used in systems by Federal and Public Safety agencies including Police, Fire, and Emergency Medical Services, etc. as indicated in the table below. Equipment programming is the responsibility of Authorized Service Personnel. Also, the radio complies with 47 CFR Part 90.203(e), in that the operator cannot directly program the transmit frequencies using the normally accessible external controls.

Per the FCC's KDB634817 guidance, "as an alternative to listing the exact frequencies, we acknowledge that it's a violation of the FCC Rules if this device operates on unauthorized frequencies"

| Frequency Range (MHz) | Part 90 | Part 22 | Part 74 | Part 80 | Federal | Grant Notes | Emission Designator Rule Part 90 |
|-----------------------|---------|---------|---------|---------|---------|-------------|----------------------------------|
| 136-150.8             |         |         |         |         | x       | EF, BE      | 8K10F1D/F1E/F1W, 11K0F3E         |
| 150.8-161.6250        | x       | x       | x       | x       |         | EF, BE      | 44 33 33                         |
| 161.6250-161.7750*    |         |         | x       |         |         | EF, BE      | 44 33 33                         |
| 161.7750-173.4        | x       |         |         |         | x       | EF, BE      | 44 33 33                         |
| 173.4-174             |         |         |         |         | x       | EF, BE      | 44 33 33                         |

\* Canada

Sincerely,



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

EXHIBIT 13C