

October 30th, 2012

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

Att: JC Chen

Subject: Response to second Correspondence 42819 for FCC ID: AZ492FT3826, EA596340

Hello Mr. Chen,

Please see below for our responses:

Q1. Please indicate which subparts under Part 22 and Part 74 that the EUT is seeking certification. This information would allow me to evaluate the EUT against all applicable rule sections. Alternatively, you may request to remove Part 22 and Part 74 authorization in this application. (AZ4489FT3829 and AZ4489FT3829 are only certified for Part 80 and Part 90.) As pointed out in KDB 634817, it is acceptable to list extended frequency outside each rule part listed. That is, even if you just certify for Part 90 (or Part 80), it is acceptable to list 136-174 MHz if the conditions in KDB 634817 are met.

R1. Rule Part 22.561 (Mobile Operations) and 22.725 (Conventional Rural Radio Telephone Stations) are the two Rule Parts applicable to this application. For Rule Part 74 Sub-part H which is for Low Power Auxiliary Stations.

The guidance given in KDB 634817 is stated in Exhibit 13c that Motorola Solutions acknowledge that it is a violation of the FCC Rules if this device operates on unauthorized frequencies. Hence, the justification for requesting 136-174 MHz be listed on the FCC Grant.

Q2. The test report and extended frequency listing request letter should be consistent with the application. As of now, they both are confusing. The report contains data that are in three categories: 1) not for FCC, 2) not for Part 90, and 3) the rest. What should we be reviewing, for example, for Part 80 compliance? The extended frequency listing request letter has incorrect frequency ranges. Please either correct or remove (since you already have the alternative statement) the table.

R2. We have taken guidance from various FCC and TCB examiners and some of these may be the source of the confusion. The radio is compliant for the entire frequency range. Also, this radio complies with the Operation requirements Part 80 sub-Part C.

As recommended, we have modified Exhibit 13c to remove the frequency table.

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

EXHIBIT 13