

November 09th, 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 42860 for Certification of Transmitter with
FCC ID: AZ492FT3826, EA596340

Hello Mr. Chen,

Please see below for our responses to your November 07, 2012 email:

I have reviewed the test report against Part 22E and Part 22F rules and found that indeed the device appeared to be qualified. However, note that I had to read into data marked as "Not for FCC" to reach that conclusion. When an application for equipment authorization is submitted, supporting materials are expected to be presented in a format which readily demonstrates compliance with each rule part it is seeking certification. It is rather unusual that the reviewer has to take compliance data for Part 90 and verify whether the data also meet Parts 22, 74, and 80 rules.

Nevertheless, I have trouble to justify that the test data also show Part 74H compliance. As a Low Power Auxiliary Station, the output power limit is 1 Watt per 74.861(d)(1) which is much lower than the 60 Watts shown in the test report. Demonstration of conformance to spurious emission limits of 74.861(d)(3) cannot be extrapolated from Part 90 data either. Furthermore, I could not find information meeting 74.882 (station identification) and 74.381 (permissible transmission) requirements. Please justify your Part 74H claim.

Response: The radio can operate from 1-50 Watts, variable power. Exhibit 6 of the Test Report, page 26 listed data at 1 Watt for Radiated Spurious Emissions. The Test Report had the words "Not for FCC Review" mistakenly inserted at the bottom of chart. That was since corrected. See the amended Test Report.

This radio is used mainly for Trunking Purposes and it has an internal algorithm which identifies the radio identification numbers as part of the pre-amble when transmitting information. We cannot find Rule Part 74.381 in the CFR 47.

As for Part 80, the general technical rules have been reviewed and the following areas need clarification and/or supporting data:

1) 80.203(b) requires that only maritime channels are available for selection. With this mixed radio having non-maritime channels available and being sold through retail channels, please explain how compliance is achieved.



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Response: We are confirming that the radio operates on maritime frequencies when in that mode. These radios are not sold in any retail channels. These are for licensed services only.

2) The maximum 10 minute transmission limit per 802.203(c).

R2. The radio is equipped with a time-out-timer and it is managed through code plug to meet the requirements of Rule Part 80.203 (c).

3) Out-of-band emission in the 1.6 GHz band, per 80.211(c), and spurious emission limits of 80.211(f).

R3. We meet out-of band in 80.211 (c) and (f).

4) Output power limit of 25 Watts for ship stations per 80.215(e), 80.215(g), and 80.215(i), and interfering emission of 80.217.

R4. The radio can operate from 1-50 Watts, variable power

The RF Exposure report appears to be missing analysis for motorcycle installations as well.

R5. Attached

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

Sincerely,

A handwritten signature in black ink that reads 'Mike Ramnath'.

Mike Ramnath (signed above)

Manager, Regulatory Compliance

Email: Mike.Ramnath@motorolasolutions.com

EXHIBIT 13