

November 16th, 2012

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

Att: JC Chen

Subject: Response to the fifth Correspondence 42922 for Certification of Transmitter with

FCC ID: AZ492FT3826, EA596340

Hello Mr. Chen,

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

However, a key issue here is that you had submitted a Part 90 test report and ask the reviewer to use the numbers to also approve Parts 22, 74, and 80. While not something typical (applicant should demonstrate compliance), I went through related rules in the other three rule parts. Some data required in other rule parts are missing in the Part 90 report. In addition, there are concerns of rule violation if the radio is programmed incorrectly, knowingly or unknowingly. The "variable power" is one example where you are requesting Part 74 approval of a 1-60 Watt radio while the rule only permits up to 1 Watt. Although the device is capable, the applicant should at least explain or attest how compliance is achieved. As the reviewer, I can extrapolate the data or information on your behalf. This is true with the spurious emission issue too.

We would take into account what has been permitted in the past. Therefore, could you please provide one or two Motorola FCC ID devices that were approved for Part 22, 74, 80 and 90 previously? Thank you.

Response:

We have historically submitted one test report that would meet or exceed the requirements of all Rule Parts applied for in the application. We now understand that you are now requiring us to refer to the applicable section of the FCC Rules and will do so for future applications. In our subsequent correspondences for this application, we have provided that information. Also, we added a footnote on page 1 of Test Report, Exhibit 6, which states "Important Note: The data in this test report meets or exceeds the technical requirements of FCC Rule Parts 22, 74, 80, and 90".

Please note that the Spurious Emissions limit for Part 90 is the same or better for Rule Part 22, 74, and 80.

With regards to issue of your concerns of a possibility that a user could violate the rules intentionally or unintentionally is addressed by Motorola providing information in our uses manual, in our CPS with a Help menu, and customer training information. It's the FCC's responsibility to inform FCC Licensed users to only transmit on authorized frequencies.

The radio is tunable from 1-50 Watt and the 1 Watt is pre-set in the CPS. The Authorized Service Personnel can access the 1 Watt, via CPS, for Rule Part 74 operations.

Please see FCC ID: AZ492FT7037 and AZ492FT7043.

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

Sincerely,

/s/ *Mike Ramnath*

Mike Ramnath (signed above)

Manager, Regulatory Compliance

Email: Mike.Ramnath@motorolasolutions.com