800 Independence Ave., SW. Washington, DC 20591



JUN 8 2005

Mr. Andy Leimer Federal Communications Commission Equipment Authorization Branch 7435 Oakland Mills Road Columbia, MD 21046

Dear Mr. Leimer:

The Federal Aviation Administration (FAA) Office of ATC Spectrum Engineering Services, has reviewed the Type Acceptance Certification requests from Park Air Systems Ltd., for the T6T 50 Watt rack mounted VHF transmitter (ID number C8LB6350/S2), the T6TR 50 Watt rack mounted VHF transceiver (ID number C8LB6550/S20), the T6R rack mounted VHF receiver (ID number C8LB6100/S2), and the T6T HS 100 Watt rack mounted VHF transmitter (ID number C8LB3100HS). The technical data for this equipment is consistent with the spectrum requirements for this class of radio. We note that the maximum 50 and 100 Watt output powers of these radios exceed the 10 Watt output power typically authorized for ATC operations in the 117.9875-121.9375, 123.5985-128.8125, and 132.0125-136.4875 MHz bands. However, we are aware that these higher powers may be required for other aviation applications in the remainder of the 118-137 MHz band. We also understand that the manufacturer has asked that these radios be type accepted for operation over the frequency 112.000-155.975 MHz. Since the National Table of Frequency Allocations specifies that the 112.000-117.975 MHz band is for Aeronautical Radionavigation systems, we do not support authorization of this communications equipment in the 112.000-117.975 MHz band.

Therefore, we have no objection to the Type Acceptance of these radios in the 118.000-155.975 MHz band, but would like to emphasize that the maximum transmit power for ATC operations will normally be limited to a maximum of 10 Watts. In addition, we ask that the FCC Type Acceptance approval specifically state that this equipment is not authorized to operate in the 112.000-117.975 MHz band and that the manufacturer needs to ensure that the units sold in the United States are configured so that the 112.000-117.975 MHz frequencies can not be selected by the end user.

Should you have any questions or concerns, please contact Mr. Donald Nellis, Spectrum Planning and International Office, at (202) 267-9779.

Sincerely.

Donald K. Willis

Manager, Spectrum Planning and International Office