Date: August 15, 2018

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Reviewing Engineer

Chelton Avionics, Inc. dba Cobham Aerospace Communications and Wulfsberg Electronics
Communication Products
6400 Wilkinson Drive
Prescott, AZ USA 86301

Re: Justify Extended Frequency Range for MODEL: RT7000PMR

To Whom It May Concern:

This letter serves justification for extended frequencies. This device FCC ID (FRWRT7000) has design capability to operate in the frequency band 136 to 174 MHz and 380 to 512 MHz and complies with 47 CFR Part 90.203(e), in that the operator cannot directly program the transit frequencies using the normally accessible external controls. Please note that Licensed End Users do not have access to any external controls that will allow them to program the equipment outside of the operational range. In addition to Parts 90 usage, this device is utilized in systems such as Federal and Public Safety agencies, e.g. police, fire, and emergency medical, etc. as indicated in the following table:

Per FCC KDB 634817 guidance, as an alternative to listing the exact frequencies, we acknowledge that it is a violation of the FCC Rules if this device operates on unauthorized frequencies.

Table 1 – Frequency Range and Rule Parts - (47 CFR Part 2.106)

Freq. Range (MHz)	Part 90	Federal Customers
136.000-150.800		X
150.8000-156.2475	X	
156.2475-157.0375		X
157.0375-161.5750	X	
161.5750-161.7750		X
161.7750-173.4000	X	
173.4000-174.0000		X
380.000-512.000		X

29.7 – 88 MHz is an FCC part 90 band. It is also covered by Industry Canada, RSS-119. This is Fixed Mobile and Land Mobile.

118 – 137 MHz is an FCC part 87 band. This is the VHF ATC COM band. It is also governed by Industry Canada, RSS-141

151.95 MHz is the high end of the 137 – 152 MHz band. This is the extended frequency range for the VHF ATC COM use for aeronautical mobile

381.5 MHz is in the 225 to 400 MHz UHF ATC COM band. This is used by the military for Air Traffic Control.

136 – 174 MHz is covered by FCC part 90 and part 80. This is fixed and land mobile and public safety band.

380 – 520 is the public safety band. 406.15 to 470 MHz is covered by FCC part 90 and Industry Canada RS-119. 470 – 512 is governed by FCC part 90. 380 – 406 MHz and 512 – 520 MHz are also used for public safety but are operated under an Extended Frequency grant note.
764 – 806 MHz is for public safety use. 763 – 775 MHz and 793 to 805 MHz are covered by FCC part 90 and Industry Canada RS-119. Any frequencies outside of these are also used for public safety but are operated under an Extended Frequency grant note.
806 – 960 MHz is for public safety use.

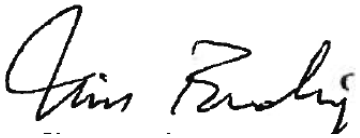
These bands are covered by FCC part 90 and Industry Canada RSS-119:

806 849
851 894
896 901
902 930
935 940

These bands are covered by FCC part 22 and Industry Canada RSS-119:

809 851
854 896
928 929
931 935
941 960
It is understood that a grant note code may be added to the grant which indicates this required operation.

Please contact me if you require any additional information.
Sincerely;



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