



**M. Flom Associates, Inc. - Global Compliance Center**

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March 11, 2003

Managing Director  
Federal Communications Commissions  
445 12<sup>th</sup> Street, SW, Room 1A625  
Washington, DC 20554

Applicant: Honeywell International Inc.  
Equipment: FCC ID: GB8TR865A EA265254  
Reference: FCC Order DA-02-379

**A. Complete explanation 87.173(b) Frequencies**

Device is a dual-spaced Transceiver operating in the 117.75 – 136.975 MHz range, with an R.F. Power Output of 8 – 18 watts, conducted, variable and with 25 kHz and 8.33 kHz channel spacing.

Section 87.39 of the Commissions Rules requires that :

- 1) U.S. Registered aircraft employ type-certified radio.
- 2) Aircraft radios must meet the technical requirements of Subpart D of Part 87 of the Commissions Rules in order to be type certified under these Rules.

Subpart D of Part 87 contains a list of assignable carrier frequencies or frequency bands and includes carrier frequencies in the VHF aircraft band used for AT Communications (namely, 117.976 MHz to 136.975 MHz)(See table 47 CFR Subsection 87.173(b)). The listed frequencies are based on 25 kHz spacing.

There is no provision in the Commissions Rules for operating on 8.33 kHz spaced channels.

Aircraft must have the capability of communicating with ground stations as directed, on the frequencies specified by the FAA, and by certain European countries where the 8.33 kHz spacing is used. Thus, the capability of U.S. registered aircraft, if not equipped with transceivers having 8.33 kHz spacing, would be impaired, as these aircraft would be unable to communicate effectively with ATC facilities in these certain European countries.

**B. Notes**

1. A waiver for similar products was given to Rockwell-Collins and Garmin (reference FCC, DA-02-379).

2. Attached please find FCC Form 159 with authorization to charge MFA Inc. credit card. Please process in the manner acceptable to the Commission.



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3. Attached is the Agent Authorization Letter authorizing MFA Inc. to act on behalf of the Applicant.

4. The certification of this by FCC Application Processing Branch is presently awaiting the granting of the waiver. (Reference: Steve Dayhoff; email: [sdayhoff@fcc.gov](mailto:sdayhoff@fcc.gov). FCC ID: GB8TR865A, EA265254, CR#24730).

Accordingly, Honeywell International Inc. is requesting a waiver to the Commissions Rules 47 CFR Section 87.173(b) to permit transceiver FCC ID: GB8TR865A having dual-spacing (8.33 kHz and 25 kHz) and operating in the band 117.975 MHz to 136.975 MHz so that this product would be acceptable for use in the countries using the 8.33 kHz spacing.

Respectfully,  
On behalf of and for Honeywell International Inc.

Agent: Morton Flom, P. Eng., President  
M. Flom Associates, Inc.

cc: via email to James Shaffer, Industry Analyst; [jshaffer@fcc.gov](mailto:jshaffer@fcc.gov)  
cc: FCC – Wireless Bureau Applications

P.O. Box 358130  
Pittsburgh, PA 15251-5130

Via certified mail