

February 10, 2020

Equipment Authorization Division  
Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046



43 Erie Street  
Victoria, BC  
Canada V8V 1P8

**Subject: Extended Frequency Justification for our FCC ID H4JCASC165B**

To Whom It May Concern:

We, Codan Radio Communications, would like to submit the following justification to show the frequency range (150-174 MHz) on the Grant of Equipment Authorization under Part 22 and 90 for our product with the FCC ID listed above.

Per the FCC'S KDB 634817 guidance, as an alternative to listing the exact frequencies, we acknowledge that it's a violation of the FCC Rules if this device operates on unauthorized frequencies. This radio is intended for use by federal agencies, public agencies, emergency services, as well as commercial, business, and industrial services. Additionally, it will be used in other countries that accept the FCC Grant of Equipment Authorization. These services account for a majority of users as described in the below table.

Frequencies (MHz)	Part 90	Part 22	Federal	ITU Region
148-150.05			X	1, 2, 3
150.05-150.8			X	1, 2, 3
150.8-152.855	90	22		
152.855-156.2475	90			
156.2475-157.1875			X	1, 2, 3
157.1875-157.45	90			
157.45-161.575	90	22		
161.575-161.775		22	X	1, 2, 3
161.775-161.9625	90			
161.9625-162.0375			X	
162.0375-173.4	90			
173.4-174			X	1,2,3 °

This radio complies with 47 CFR Part 90.203(e) in that the operator cannot program and transmit on frequencies, other than those programmed by the manufacturer, service or maintenance personnel, using the equipment's external operation controls.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nathan Wren', with a stylized flourish at the end.

Nathan Wren  
Engineering Operations Manager



A member of the Codan group of companies.

T: +1 250 382 8268

**CODANRADIO.COM**