

Feb. 5th, 2018

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

Attn: Reviewing Engineer

Subject: Justify Extended Frequency Range for MODEL: TK-D240-K, TK-D240-M and TK-D240V-K,  
FCC ID: K44475400.

To Whom It May Concern:

This letter serves justification for extended frequencies

This device has design capability to operate in the frequency band 150 to 174 MHz and complies with 47 CFR Part 90.203(e), in that the operator cannot directly program the transmit 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. Equipment programming is the responsibility of Kenwood approved Service Agents.

In addition to Parts 90/80/22/74 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:

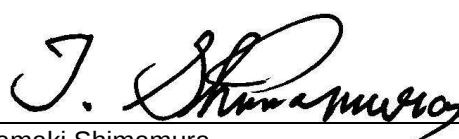
| Freq. Range (MHz) | Part 90 | Part 80 | Part 22 | Part 74 | Federal Customers |
|-------------------|---------|---------|---------|---------|-------------------|
| 150.0500-150.8000 |         |         |         |         | x                 |
| 150.8000-152.8550 | x       |         | x       |         |                   |
| 155.8550-154.0000 | x       |         |         | x       |                   |
| 154.0000-156.2475 | x       | x       |         |         |                   |
| 156.2475-157.1875 |         | x       |         |         |                   |
| 157.1875-157.4500 | x       | x       |         |         |                   |
| 157.4500-161.5750 | x       | x       | x       | x       |                   |
| 161.5750-161.6250 |         | x       | x       |         |                   |
| 161.6250-161.7750 |         |         | x       | x       |                   |
| 161.7750-161.9625 | x       | x       |         |         |                   |
| 161.9625-162.0375 |         | x       |         |         |                   |
| 162.0375-173.2000 | x       |         |         | x       |                   |
| 173.2000-174.4000 | x       |         |         |         |                   |
| 173.4000-174.0000 |         |         |         |         | x                 |

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

It is understood that a grant note code may be added to the grant which indicates this required operation. In addition, we acknowledge that it is a violation of FCC rules if the device operates on unauthorized frequencies.

Please contact me if you require any additional information.

Sincerely,



Tamaki Shimamura  
Communications Systems Division  
JVC KENWOOD Corporation