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Timco Engineering, Inc.  
849 NW State Road 45  
P.O. Box 370  
Newberry, Florida 32669

FCC ID: O871286

Subject: Sea Air and Land Communications' justification letter for expanded frequency range 440 - 470 MHz

Gentlemen;

You have asked Sea Air and Land Communications Ltd. for justification to have the 440-470 MHz frequency range appear on the face of the FCC Grant of Certification for a Part 90 Certification.

- (1) This radio is used in systems by Federal and Public Safety agencies including Police, Fire, and Emergency Medical Services, etc.
- (2) This frequency range is regarded as usual and customary by the United States Federal Government and its various departments, user organizations and the military to appear on the face of the equipment Grant of Certification.
- (3) Sea Air and Land Communications' Marketing Department plans to ensure that USA users, other than those specifically identified in this letter, do not operate within the bands of 440-470 MHz, as controlled by the users' FCC station license.
- (4) This device will not be marketed to USA users, other than those identified in the letter, namely the US Government and its various departments, user organizations and the military, for operation in 440-470 MHz frequency range.
- (5) Equipment programming is the responsibility of Authorized Service Personnel.
- (6) The radio complies with 47 CFR Part 90.203(e), in that the operator cannot directly program the transmit frequencies using the normally accessible external controls.
- (7) As per FCC KDB634817 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.

Yours faithfully,

John Croft  
Engineering Manager  
Sea Air and Land Communications Ltd.