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25th August 2016

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

Subject: Extended Frequencies Justification for a 700 MHz Public Safety Narrowband Device

Gentlemen:

We, Spectra Engineering, would like to submit the following justification to address the 700 MHz Public Safety Frequencies and to list them on our Grant of Equipment Authorization under Part 90 for our FCC ID: OKRMDXR7V

Per the FCC'S KDB 634817 D02 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	Rule Part	Non-Federal	ITU Region	Notes
763-768			2	PS NB Not allowed
768-769	THE		2	PS Guardband - No Transmitting
769-775	PS 90R			
851-854	90S NPSPAC			
854-860	90			
860-861	90			
861-862			1, 2, 3	PS Guardband - No Transmitting
862-869	90 CMRS			

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,
Gary Jacobs.

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