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Ref:

**Re: STZSRP9170KMA: Extended Frequency
Justification**

29 June 2012

Dear Sir/ Madam,

ComGroup Australia would like to submit the following justification to show the frequency range as 220 – 222 MHz on the Grant of Equipment Authorization for STZSRP9170KMA portable radiocommunications transceiver.

This frequency range is applicable to FCC Part 90 radiocommunication systems that would include utilities and business and industrial services etc. These services account for the majority of users on this band. The frequencies for this band are arranged in pairs with 1.0 MHz separation.

Frequency Pairs Available with channel bandwidths greater than 5 kHz as per CFR 47 Part 90.203(k) are as follows:

220.0025 – 220.7975 with 221.0025 – 221.7975	Part 90
220.8525 – 220.8975 with 221.8525 – 221.8975	Part 90
220.9275 – 220.9975 with 221.9275 – 221.9975	Part 90

Also the frequency of operation of the STZSRP9170KMA radio cannot be programmed by the operator to transmit on frequencies other than those programmed by service or maintenance personnel. From the FCC KDB634187 guide, it is noted that FCC rules would be violated if the STZSRP9170KMA equipment were programmed and operated on unauthorized frequencies.

Sincerely,



Robert Stowell

Senior Engineer