

**Office of Engineering and Technology
Laboratory Division
Equipment Authorization Branch
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046**

Subject: Extend Frequencies Justification Original Application FCC ID: **SY4-A02064**

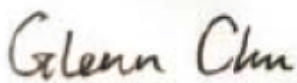
Company: Shanghai Huace Navigation Technology Ltd.
Address: 577 Songying Road, Qingpu District, 201706 Shanghai, China.

Dear Sir or Madam;

We, **Shanghai Huace Navigation Technology Ltd.** declares that the Digital radio meets 47CFR Section 90.203(j)(4) and 90.203(j)(5) spectrum efficiency requirement; This Digital radio is support both 12.5 KHz and 25 KHz for GMSK, 6.25KHz,12.5 KHz and 25 KHz for 4-FSK digital modulation; Emission Designator: F1D for data modes, also this Digital radio designed in accordance with ETSI TS 102 361-1 requirement, will at least support 4800 bits per second in a 6.25 KHz channel bandwidth, 9600 bits per second in a 12.5 KHz channel bandwidth and 19200 bits per second in a 25 KHz channel bandwidth, GMSK will refer 2 time slots in one 12.5 KHz bandwidth and refer 4 time slots in one 25 KHz bandwidth accordance to ETSI ETS 102 361-1, which equal with $9600/2 = 4800$ and $19200/4 = 4800$ bits per second in one 6.25 KHz channel bandwidth;

We, **Shanghai Huace Navigation Technology Ltd.** declares that the Digital radio capable of operating on the nationwide public safety interoperability calling channel (453.2125 MHz), meets 47CFR Section 90.203(j)(1) requirement;

(Signature)



June 20, 2025

Name(in block letter)	Glenn Chu
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