

October 19, 2015

Federal Communications Commission  
EQUIPMENT AUTHORIZATION BRANCH  
7435 Oakland Mills Road  
Columbia, MD 21046

Subject: Extended Frequency Justification Letter

Dear Sirs:

The ATH2425M80 transceiver was designed to operate in the frequency bands 136.0-174.0 MHz.

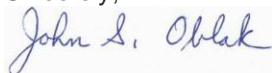
To aid equipment authorization in other countries that accept the United States FCC Grant of Certification, this will serve as a request that the FCC list the frequencies of 136.0 to 174.0 MHz under the FCC Rules Part 90 as listed in the table below and the 731 form on the FCC Grant.

Per the FCC's KDB634817 guidance, as an alternative to listing the exact frequencies, we acknowledge that it's a violation of the FCC Rules if the device operates on unauthorized frequencies. Additionally, it will be used in other countries that accept the FCC Grant of Equipment Authorization. These services account for the majority of users as described in the below table.

FREQUENCY RANGE (MHZ)	Rule Part	Federal and US Military Customers
136-144		X
<b>144-148</b>		X
148-149.9		X
<b>149.9-150.05</b>		X
150.05-156.2475	90	
<b>156.2475-157.1875</b>		X
157.1875-161.575	90	X
<b>161.575-161.775</b>		X
161.775-161.9625	90	
<b>161.9625-162.0375</b>		X
162.0375-173.4	90	
173.4-174		X
763-775	90	
793-805	90	
806-809	90	
809-824	90	
851-854	90	
854-869	90	

Equipment programming is the responsibility of Authorized Service Personnel only. In addition, 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.

Sincerely,



John S. Oblak  
VP, Standards and Regulatory Affairs