

ComNav Technology Ltd.
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Date: 2021-03-27
To: Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD

Subject: Extended Frequencies Justification for Certification of Transmitter with FCC ID: 2ACHBN5

Dear Sir/Madam,

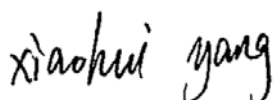
This transmitter was designed to operate in following frequency ranges: 410-470MHz
To aid equipment authorization in other countries which accept the United States FCC Grant for Certification, ComNav Technology Ltd. is requesting that the FCC lists the frequencies 410-470MHz, under FCC Rule Parts 22, 74, 80 and 90 on the FCC Grant.

ComNav Technology Ltd. attests that the GNSS Receiver will not be marketed to USA users with the frequency band which is not allowed by the rule Parts 22, 74, 80 and 90. 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 this device operates on unauthorized frequencies.

Frequency Range (MHz)	FCC Rule Part
410.0250-450 MHz	FCC Part 90
450-454MHz	FCC Part 74/ FCC Part 90
454-455MHz	FCC Part 22/ FCC Part 80
455-456MHz	FCC Part 74
456-460MHz	FCC Part 22/ FCC Part 80/ FCC Part 90
460-462.5375MHz	FCC Part 90
462.7375-467.5375MHz	FCC Part 90
467.7375-470MHz	FCC Part 80/ FCC Part 90

Also, equipment programming is the responsibility of Authorized Service Personnel, the GNSS Receiver complies with 47 CFR Part 90.203(e), in that the operator cannot directly program the transmit frequencies using the normally accessible external controls.

Please contact me if you require any additional information.
Sincerely Yours,



Best regards,
Client's name / title : xiaohui yang
Contact information / address: ComNav Technology Ltd. /Building 2, No.618 Chengliu Middle Rd.,Shanghai,China