

Technology Park
2 Second Avenue
Mawson Lakes SA 5095
Australia

28 February 2020

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

Re: Extended Frequency Justification; FCC ID: DYY2410

Codan Limited requests that the FCC certify the entire 1.6 MHz to 30 MHz spectrum to include the Part 90 extended frequencies. This would be done to facilitate the requirements of agencies covered by under NTIA spectrum usage, who must purchase equipment from private industry manufacturers governed by the FCC rules. This conflict in spectrum allocation reduces the options available to these agencies for commercial off-the-shelf equipment.

However, it is understood that to maintain compliance with the Part 90 rules, the 2410 ManPack HF Transceiver can only be programmed for the frequencies listed as allowable in the FCC Table of Frequency Allocations, 47 CFR § 2.106.

Codan Limited acknowledges that the FCC Part 90 rules are violated if the 2410 ManPack HF Transceiver transmits on unauthorised frequencies.

To this end, the 2410 ManPack HF Transceiver is factory locked to transmit only on frequencies licensed to the user. The equipment can only be purchased through an authorised dealer who programs the channel frequencies to ensure this restriction is enforced. It is the user's responsibility to obtain the appropriate licenses for use. The user is excluded from selecting unlicensed transmit frequencies. The user is made aware of these restrictions in the "Compliance" section of the supplied handbooks.

Sincerely,



Bruce Johnson
Senior RF Design Engineer