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Date: 2016-3-03
FEDERAL COMMUNICATIONS COMMISSIONS
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Extended Frequencies Justification

Dear Sir/Madam,

The Radio with FCC ID: 2AE6CEM8100VHF was designed to operate in the frequency bands 136~174 MHz

To aid equipment authorization in other countries which accept the United States FCC Grant for Certification, Shenzhen Excera Technology Co., Ltd. is requesting that the FCC lists the frequencies 136~174 MHz, under FCC Rule Part 90 on the FCC Grant.

Shenzhen Excera Technology Co., Ltd.. Attests that the radio will not be marketed to USA users with the frequency band which is not allowed by the rule part 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
136-150.8 MHz	For Federal
150.8-152.855 MHz	FCC Part 90
152.855-154 MHz	FCC Part 90
154 -156.2475 MHz	FCC Part 90
157.1875 -157.45 MHz	FCC Part 90
157.45-161.575 MHz	FCC Part 90
161.775-161.9625 MHz	FCC Part 90
162.0375-173.2 MHz	FCC Part 90
173.2-173.4 MHz	FCC Part 90
173.4-174 MHz	For Federal

Also, equipment programming is the responsibility of Authorized Service Personnel, 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 Yours,

Signature: 
Jubin Zhang
Manager