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Subject: Extended Frequencies Justification

Gentlemen:

The FCC ID: Z5W-104013 was designed to operate in the frequency bands 450-470 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 450-470 MHz under the FCC Rules Part 22, 74, 90, as listed in the table below & 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 this 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 a majority of users as described in the below table.

FREQUENCY	Dula Dast	F	I
	Rule Part	Federal	ITU Region
RANGE (MHZ)			
450.0-454.0	74, 90		1, 2, 3
454.0-455.0	22		1, 2, 3
455.0-456.0	74		1, 2, 3
456.0-460.0	22, 90		1, 2, 3
459.0-460.0		X	1, 2, 3
460.0-	00		, ,
462.5375	90		
462.5375-		V	4.0.0
462.7375		X	1, 2, 3
462.7375-	00		
467.5375	90		
467.5375-		V	4.0.0
467.7375		X	1, 2, 3
467.7375-	90		
470.0	90		

Equipment programming is the responsibility of the Manufacturer and 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 Yours,

Damm Cellular Systems A/S

Moritz Hynkemejer

Senior Adviser and Board Member