

Shanghai eSurvey GNSS Co., Ltd.

Subject: Extend Frequencies Justification Original Application FCC ID: **2A34K-TRU35**

Company: Shanghai eSurvey GNSS Co., Ltd.

Address: Zhuyuan Rd, Minhang District, Shanghai, China

Dear Sir or Madam;

We, **Shanghai eSurvey GNSS Co., Ltd.** declares that the Digital radio meets 47CFR Section 90.203(j)(4) and 90.203(j)(5) spectrum efficiency requirement;

1. This equipment meets the spectrum efficiency standard of one voice channel per 6.25 kHz of channel bandwidth as required by 47CFR 90.203(j)(5).
2. The digital radio adopts GMSK and 4FSK digital modulation with 12.5 KHz and 25KHz channel spacing, Emission Designator F1D for data mode. It is designed per ETSI TS 102 361-1, supporting 9600 bits per second in 12.5 KHz channel spacing and 19200 bits per second in 25 KHz channel spacing. Converted to standard bandwidth benchmark, it supports 4800 bits per second per 6.25 kHz channel bandwidth, fully meeting the minimum data rate requirement of 47CFR 90.203(j)(5).
3. The device is capable of data transmission, with transmitter output power greater than 500 mW and channel bandwidth wider than 6.25 kHz, which fully falls within the scope of the above regulatory requirement.

In addition, this Digital radio is capable of operating on the nationwide public safety interoperability calling channel (453.2125 MHz), meets 47CFR Section 90.203(j)(1) requirement;

Signature:



Date: 2026-07-07

Name:

Reinhard Lyu

Title:

Purchase Supervisor

Company:

Shanghai eSurvey GNSS Co., Ltd.