



MOTOROLA

FCC ID: ABZ99FT3081

Date: May 20, 2002

Authorization & Evaluation Division
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Application for Certification of Transmitter with FCC ID: ABZ99FT3081

Gentlemen:

Motorola Inc., 1313 E. Algonquin Road, Schaumburg, Illinois, herein submits application for Certification of the equipment identified by FCC ID number ABZ99FT3081.

This transmitter is intended for use in a mobile radio application with capabilities for conventional and trunked communications with a conducted power of 1 Watt (+30 dBm) to 30 Watts (+44.8 dBm).

The subject transmitter complies with CFR Title 47, Section 90.203, in that the operator cannot directly program the transmit frequencies using only the normally accessible external controls of the unit.

On December 6, 2001, representatives from Motorola Inc. and one of our customers met with the Commercial Wireless Division to discuss our intention for the use of this equipment, utilizing 12.5 kHz channel spacing with ± 2.5 ppm frequency stability, in the 220-222 MHz band. In attendance were representatives from the FCC's Equipment Authorization Branch and from the Wireless Telecommunications Bureau. At that time we presented an analysis to demonstrate that our intended operation of this equipment would not impact existing 5 kHz users in this band, in that the undesired emissions from our equipment meeting emissions mask 90.210(d) for 12.5 kHz channel spacing, operating under the frequency assignment guidelines we propose, would not exceed the undesired emissions level produced by an adjacent 5 kHz user, even if the effects of ± 2.5 ppm stability were included. We indicated that the subject transmitter is similar to that previously certified under FCC ID: AZ492FT3796, except having been redesigned for operation in the 217-218, 219-220 and 220-222 MHz bands, and for 12.5 kHz channel spacing only. Because the subject transmitter complies with all applicable rules, and no request for a change of rules was made, it was felt that Certification was achievable.

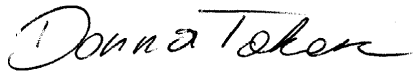
We are requesting Certification under Part 80 as well as Part 90 of the Commission's Rules to allow operation of this equipment in the 217-218 MHz and 219-220 MHz AMTS bands, per CFR Title 47 Part 80.385. This equipment meets or exceeds the technical requirements of CFR Title 47 Part 80 Subpart E. The equivalence of G3E phase modulation emission is achieved by frequency modulation with pre-emphasis. The applicable Rules parts for the frequencies of operation are:

<u>Frequency Range (MHz)</u>	<u>FCC Rules Parts</u>
217 – 218	80, 90
219 – 220	80, 90
220 – 222	90

Pursuant to CFR Title 47 Part 80.215 (j), this equipment will be installed by licensed systems operators who have identified a plan for the use of higher power equipment than the 18 watt ERP limit of Part 80.215 (i) for implementation in specific geographical areas, and will utilize site location, antenna height and efficiency, channel assignment, and the variable power output capability of this equipment to control interference to or from other users. The output power of this equipment is continuously variable from 30 watts to 1 watt.

Enclosed is a complete Certification Application. Please contact me if you require any additional information.

Sincerely,



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