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Dear Sid,

To answer your question about how the frequencies are programmed into the K66HX292UT.
Here is the procedure:

K66HX292UT frequencies program by using PC IBM compatible and cable hardware. The radio also can clone frequencies and radio information from one radio to other, by using special clone cable.

Equipment needed:
IBM PC compatible
PPS/3 programming cable
Programming software
Clone cable

Connect K66HX292UT to IBM PC by using the PPS/3 cable. Load programming software into IBM PC; enter frequencies and radio options as needed. Put radio into program mode by turn channel knob to 14, hold AUX and F1 button then turn on radio. Follow instructions from program to complete the programming procedure.

As for clone the frequencies and radio options from one K66HX292UT to other. Connect two radios with a special clone cable. Set one radio to be the sender of information and the other to receive.

I hope this would help you out. I think what the FCC is looking for is, they want to make sure the only way to program the radio is by using some type of special procedure and can not be done with the radio alone. If you need any more information please let me know.

Best regards,

Johnathan Pham