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Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Extended Frequency Justification Letter

To whom it may concern:

This justification is provided in accordance with FCC KDB Publication 634817 D01, Section II requirements for devices with tuning capability outside Part 90 allocated spectrum.

The transceiver hardware is designed to support an extended frequency tuning capability of 136–174 MHz. However, for the United States market, frequencies outside those allowed under FCC Rule Part 90 are disabled in software and cannot be accessed or programmed by the end user.

To ensure compliance with FCC Part 90, the following controls are implemented:

- Programming access requires proprietary software
- A manufacturer-controlled programming cable is required
- A service password prevents unauthorized configuration changes
- No RF tuning or direct frequency entry capability is available from the user interface
- No keypad entry or VFO mode exists; the user can only select pre-programmed channels

Only authorized service centers, licensed dealers, or qualified government agencies may modify the frequency programming for the U.S. version. End-users are strictly prevented from altering the operating bands or enabling out-of-band operation.

The extended tuning range exists solely to:

- Support international frequency allocations
- Maintain consistent hardware across multiple regulatory markets
- Allow service alignment and calibration during maintenance

Although capable of broader tuning by design, the U.S. marketed configuration only operates within FCC Part 90 authorized spectrum, and all controls prevent access to frequencies outside the allowed range.

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Sincerely,



Vice president / Hwan-Dae Kim
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