

Date: March 11, 2024

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

RE: FCC PAG Checklist for Part 15.255 Rules
FCC ID: 2BCCA-ANGEL0G1RM1

To Whom It May Concern:

FCC comments:

1. What do you mean by "Except fixed field disturbance sensors at 61-61.5GHz, 10dBm(peak)"? Which FCC provision/Rule you are employing?

KMO reply:

a. The mean for fixed field disturbance sensors other than those operating under the provisions of paragraph (c)(2) of this section, and short-range devices for interactive motion sensing, the peak transmitter conducted output power shall not exceed -10 dBm and the peak EIRP level shall not exceed 10 dBm.

b. For this EUT, the FCC provision/Rule is 15.255(c)(2)(v) for frequency range 61.0–61.5 GHz and FCC provision/Rule is 15.255(c)(2) for except frequency range 61.0–61.5 GHz,

2. Please clarify about the Occupied Bandwidth:

2.1 What do the Mask D1 and D2 indicate? (Test Mode 1)

KMO reply: D2 line indicates the highest level, D1 line indicates the 6dB offset below D2. It shows reference only.

2.2 Are there 2 OBW within a spectrum (D1 and D2) in Test Mode 1?

KMO reply: No. This is working pattern from the EUT.

2.3 What is the difference between Test Mode 1 and Test Mode 2?

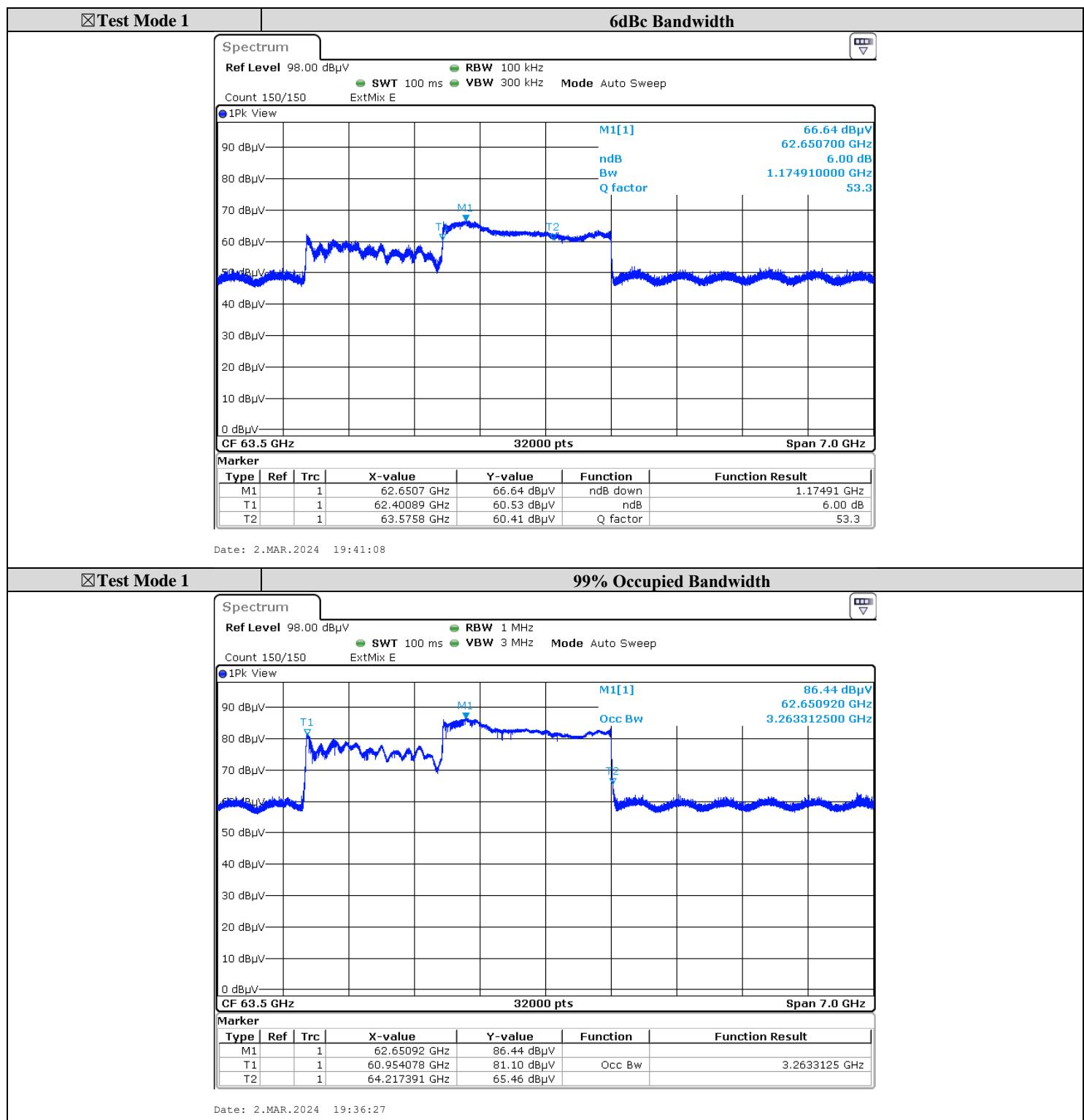
KMO reply: The two different scripts of Test Mode 1 and Test Mode 2 were provided by manufacturer corresponding to each occupied bandwidth tested: 3300MHz and 300MHz

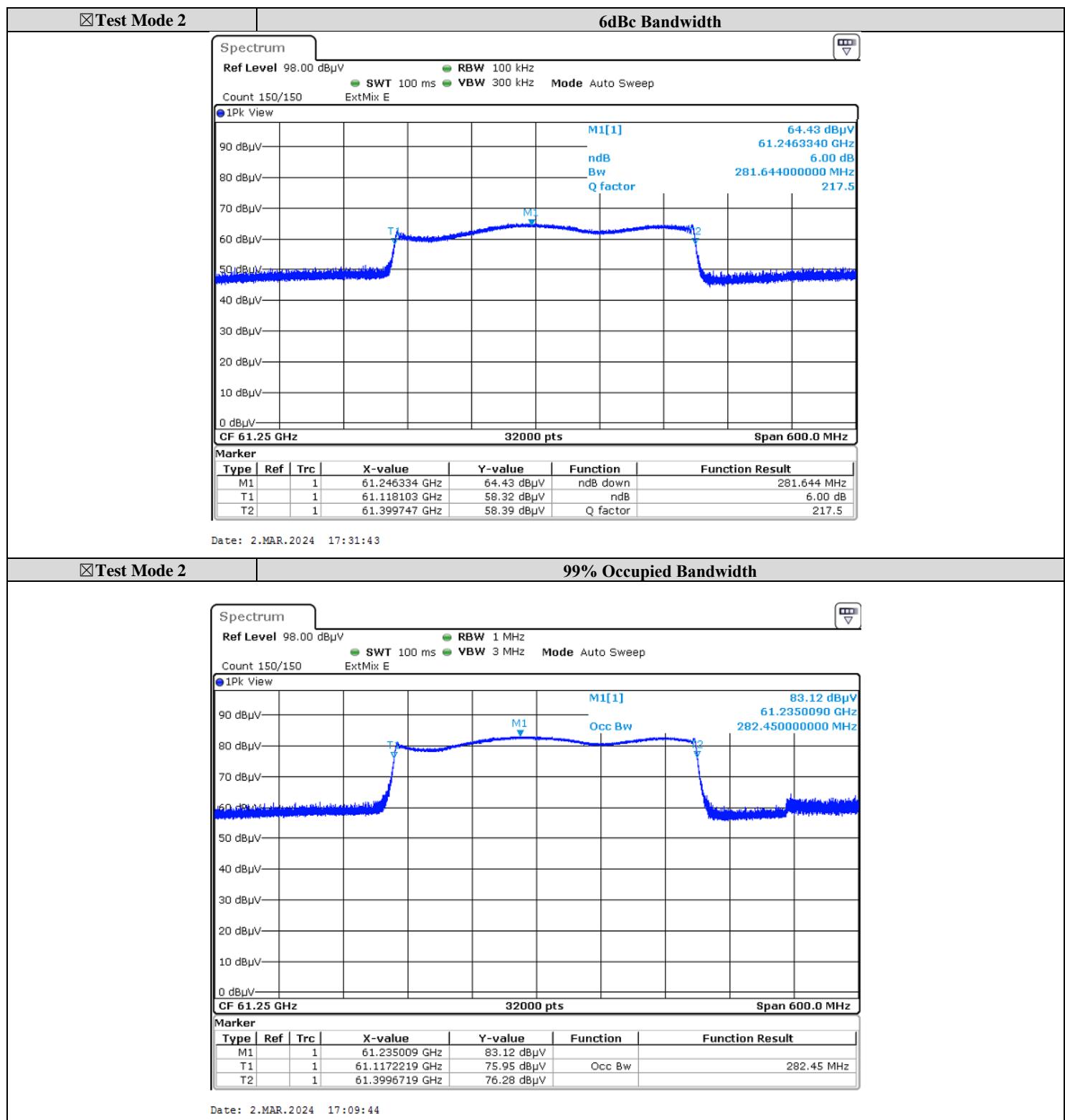
2.4 Function Result is missing for some.

KMO reply: Yes, compared to the table of 99% Occupied Bandwidth, the Function Result of 6dB Bandwidth is missing some. But the missing data is already rendered in the plot by the D2 parameter. We have updated the plot as below.

2.5 It looks too noisy.

KMO reply: We have updated the plot as below:





3. Have you considered the recent TCB Workshop presentation and KDB Pub. 364244 Meas 15.255 Radars DR01-45264 on this subject?

KMO reply: Because the above document was not released during the testing period, the test report did not refer to KDB Pub. 364244 Meas 15.255 Radars DR01-45264. We will use it in the future.

Please use C63.2020 for the future as opposed to C63.2013.