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Date: March 18, 2025

Federal Communications Commission
Office of Engineering & Technology
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

Subject: KDB 987594 D01 U-NII 6GHz General Requirements

FCC ID: A4RGUL82, A4RG45RY

We, Google LLC, declare that the devices comply with the Dual Client (6CD) and Very Low Power (6VL) device protocol and restrictions detailed below:

Dual Client (6CD):

1. This device will only associate and connect with a low-power indoor Access Point, subordinate device, or standard access point and never directly link to any other client devices.
2. This device will always initiate transmission under the control of a low power indoor AP or subordinate or standard client except access point for brief communications before joining a network. These quick messages will only occur if the client has detected an indoor AP, subordinate, or standard access point operating on a channel. These brief messages will have a time-out mechanism such that if it does not receive a response from an AP it will not continually repeat the request.
3. This device, when associated and connected with a low-power indoor access point, subordinate or standard access point device, will operate at a power lower as advertised by the indoor access point, subordinate, or standard access point:
 - a. Lower than or equal to the power advertised by the low-power indoor access point or subordinate and never above the maximum output power allowed by the FCC grant for clients associated with indoor clients or subordinates.
 - b. At least 6dB below the power advertised by the standard access point.
4. We acknowledge the device is prohibited for control of or communications with unmanned aircraft systems, including drones.

Very Low Power 6VL:

1. Device Protocol Attestation Statement:
 - a. These devices will prioritize spectrum above 6.105 GHz. The 6GHz AP Channel Selection (APCS) algorithm will determine channels in the UNII-5, UNII-6, UNII-7 and UNII-8 bands, with the least

interference starting from 6.105 GHz (CH33). If no suitable channels are found only then will APCS look for channels below 6.105 GHz.

- b. These devices will use a link-budget based Transmit Power Control (TPC) mechanism for all VLP channels/bandwidths operating in the UNII-5, UNII-6, UNII-7 and UNII-8 bands. The TPC mechanism triggers in an environment where the received signal strength (RSSI) is above pre-determined thresholds.

2. Device restrictions:

- a. Operation is prohibited on oil platforms and aircraft, except that operation of this device in 5.925-6.425 GHz is permitted in large aircraft flying above 10,000 feet.
- b. These devices are prohibited for control of or communications with unmanned aircraft systems, including drones.

Sincerely yours,



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