

TEI

From: Chung, Mark (Taipei) [Mark.Chung@sgs.com]
Sent: Friday, January 06, 2012 6:11 AM
To: tei@timcoengr.com
Cc: Hsieh, Alex (Taipei); Hsu, Judy (Taipei)
Subject: FW: TIMCO-TCB/Request for additional info - HEWLETT-PACKARD COMPANY - FCC ID: B94HHI31C
Attachments: Support Bulletin - Setup for Country Or Regulatory Domain on AR6002-Based Target Firmware.pdf
Importance: High

Dear Sirs,

Please check the attachment and take the arguments as your step-by-step reference that addresses FCC's RT.

The documentation of AR6002 regulatory domain serves communal usages for AR6003-based Wifi Chipset as well.

Please advise if problem is not addressed properly, and do instruct what exact documentation shall be prepared for.

1) Does this device meet the requirements for operation in the 5400 - 5725 MHz band specified in KDB 443999?

[SGS] KDB 443999 is applicable to master device or slave one with ad-hoc or DFS capability. This given application is a slave device in which ad-hoc or DFS function is disabled via firmware. Please see the bulletin as attached. On the page 1 of the regulatory domain as defines by Athelos, DFS support is stated as "No" while device is operating in U.S. The specific country code to U.S is programmed to EEPROM, and potential end user cannot get access to change it.

2) Is this an indoor device, outdoor device, or multi-use device? A multi-use device can operate in both indoor and outdoor configurations; such device will have to meet all the requirements for outdoor device.

[SGS] The related application is device of multi-usage.

3) Verify that the 5600 - 5650 MHz band is notched. The test report should include 20 dB BW plots for the 5600 and 5650 MHz band edges and an attestation statement that the device does not transmit in the notched band.

[SGS] Unless it is Master device, or Slave device with DFS capability or ad-hoc, otherwise, the requirement as defines by KDB 447339 shall not be applicable. This given application is slave device w/o DFS and ad-hoc capability.

4) Verify that this application contains a complete User's Manual and/or Professional Installers Manual. If the manual is not complete, upload an updated User's Manual exhibit.

[SGS] The manual of original filing is the finalist one, and no further revision would come out upon the sale of devices.

5) Verify that this device meets the uniform channel spreading requirements on the remaining (non-notched) channels once the device is in operation.

[SGS] Again, KDB 443399 shall not be applicable to this related application. The corresponding DFS test has followed FCC-06-96A1, and “uniform spreading” isn’t required compliant test item as “client without radar detection” mandates. Please the following table as excerpts from FCC-06-96A1 as your convenience referring to.

Table 1: Applicability of DFS Requirements Prior to Use of a Channel

Requirement	Operational Mode		
	Master	Client Without Radar Detection	Client With Radar Detection
<i>Non-Occupancy Period</i>	Yes	Not required	Yes
<i>DFS Detection Threshold</i>	Yes	Not required	Yes
<i>Channel Availability Check Time</i>	Yes	Not required	Not required
<i>Uniform Spreading</i>	Yes	Not required	Not required
<i>U-NII Detection Bandwidth</i>	Yes	Not required	Yes

6) Explain how this device meets the Software Configuration Control requirements of KDB 594280 including country code selection - see draft KDB at (<https://fjallfoss.fcc.gov/eas/comments/GetPublishedDocument.html?id=205&tn=511416>). If there is any user permitted configuration control, please explain what controls are provided to the user and if any will take the device out of compliance; also explain what prevents the end user from downloading and operating non-US software. Additional questions for outdoor and multi-use devices:

[SGS] The capability to select the country code can be only and professionally done by chipset vendor and the manufacturer by programming the specific coding to EEPROM. As followed by regulatory bulletin, U.S variant is coded to 0x4067, and cannot allow to be changed while integrating into the host of tablet platform.

7) Submit a Letter Exhibit identify the specific expertise and the training required by the professional installers for installing these types of devices.

[SSG] This expectation looks to be related what KDB 443999 mandates. Again, this related application is client device w/o DFS capability and Ad-hoc.

8) Explain how this device can meet the 30 MHz frequency separation from TDWR (i.e.: Manually blocking frequencies by the professional installer, device notches 5470 -5680 MHz, etc.)

[SGS] Please see the reply to comment 7.

9) Does the manual for the installers and operators contain the information on how to register the device with the voluntary industry data base if operating within 35 km of any TDWR site location?

[SGS] Please see the reply to comment 7.

BR,

Mark

Note: KDB 443999 has been updated and is no longer limited to indoor DFS devices. Please be sure that you are using the latest KDB Publications when answering these questions. If you want the application Dismissed send in a correspondence and Letter Exhibit requesting Dismissal. Otherwise, please answer the following questions. Include in the correspondence how you plan on updating the test sample so that it meets these requirements. You can update the test sample by upgrading the firmware or having the sample returned for an upgrade. It is acceptable to upgrade the firmware on the scheduled test date. If we have not requested a sample, make sure that the sample meets these requirements when the sample is requested. Scheduling will occur when the application and sample meet all of the requirements stated below.

1) Does this device meet the requirements for operation in the 5400 - 5725 MHz band specified in KDB 443999?

2) Is this an indoor device, outdoor device, or multi-use device? A multi-use device can operate in both indoor and outdoor configurations; such device will have to meet all the requirements for outdoor device.

3) Verify that the 5600 - 5650 MHz band is notched. The test report should include 20 dB BW plots for the 5600 and 5650 MHz band edges and an attestation statement that the device does not transmit in the notched band.

4) Verify that this application contains a complete User's Manual and/or Professional Installers Manual. If the manual is not complete, upload an updated User's Manual exhibit.

5) Verify that this device meets the uniform channel spreading requirements on the remaining (non-notched) channels once the device is in operation.

6) Explain how this device meets the Software Configuration Control requirements of KDB 594280 including country code selection - see draft KDB at (<https://fjallfoss.fcc.gov/eas/comments/GetPublishedDocument.html?id=205&tn=511416>). If there is any user permitted configuration control, please explain what controls are provided to the user and if any will take the

device out of compliance; also explain what prevents the end user from downloading and operating non-US software. Additional questions for outdoor and multi-use devices:

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9) Does the manual for the installers and operators contain the information on how to register the device with the voluntary industry data base if operating within 35 km of any TDWR site location?

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