



Date: 7 December 2011

Federal Communications Commission  
Office of Equipment Technology  
Equipment Authorizations

Sent via E-Mail

Re: Correspondence of 7 December 2011; PBA Inquiry: 388996, for FCC ID: IHDP56MF2.

Dear Sir or Madam,

Motorola Mobility, Inc., 8000 W. Sunrise Blvd.; Suite A; Plantation, FL, herein submits its response to your 15 November 2011 request for further information on FCC ID: IHDP56MF2.

Q 1. The user's manual contains indoor use only instruction. Does the applicant believe that such message is sufficient to prevent the tablet from being used outdoor while transmitting in the 5150-5250 MHz band where outdoor used is prohibited per Part 15.407(e)?

**Response:**

We note that, in the User Guide submitted with this application, there are two locations where guidance is provided to the end user with respect to the indoor use constraint: Part 2 Pages 51 and 52. This language has been provided based on feedback we have received on previous applications featuring U-NII capabilities (from the PCTEST).

We are aware of other manufacturers that have similar products with similar capabilities, and feature similar language in their User Guides. We note that the FCC does not specify user guide language for this. We believe that our current guidance is sufficient, and note that we currently advise users not to use Wi-Fi at all outdoors, independent of its band of operation (though we reserve the right to change this language going forward).

The device has no facility to detect outdoor use, and thus cannot disable U-NII operation on its own. However, the user has limited ability to control the spectrum that the device utilizes for Wi-Fi. Per the instructions in the User Guide (Part 2, Page 41) the user can choose not activate any APs known to operate within the U-NII spectrum.

Practically speaking, we note that in the Operational Description (Section 12.6.1 and the last table in Section 12.6.3.9) the device can only operate as a Client in the U-NII band (i.e. Personal Hotspot mode does not support operation within this band). As such, it can only operate when associated with a certified master device, which in turn has the same indoor use restrictions. Signals in the 5 GHz range are known not to penetrate walls very effectively, and as such it is unlikely that the device could operate as a client in this mode when outdoors. It *might* be possible at the threshold (right up against a window, perhaps), but certainly not when further removed from the AP.

If you have any questions, please contact me at (954) 723-6272, or via e-mail.

Sincerely,

*John Lewczak (signed)*

Engineering Manager  
Product Safety and Compliance  
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