

## Declarations Guidelines for Unlicensed Personal Communication Service (PCS) Devices FCC Part 15, Subpart D

The following provides the standard requirements for your kind reference. Details please refer to FCC Part 15, Subpart D.

15.319 (f)	<p>Operational Failure Requirements:</p> <p>The device shall automatically discontinue transmission in case of either absence of information to transmit or operational failure. These provisions are not intended to preclude transmission of control and signaling information or use of repetitive codes used by certain digital technologies to complete frame or burst intervals.</p>
15.319 (c) (6)	<p>If the selected combined time and spectrum windows are unavailable, the device may either monitor and select different windows or seek to use the same windows after waiting an amount of time, randomly chosen from a uniform random distribution between 10 and 150 milliseconds, commencing when the channel becomes available.</p>
15.323 (c) (12)	<p>Fair Access:</p> <p>The provisions of (c)(10) or (c)(11) shall not be used to extend the range of spectrum occupied over space or time for the purpose of denying fair access to spectrum to other devices.</p>
15.323 (c) (10)	<p>Duplex System LBT:</p> <p>An initiating device may attempt to establish a duplex connection by monitoring both its intended transmit and receive time and spectrum windows. If both the intended transmit and receive time and spectrum windows meet the access criteria, then the initiating device can initiate a transmission in the intended transmit time and spectrum window. If the power detected by the responding device can be decoded as a duplex connection signal from the initiating device, then the responding device may immediately begin transmitting on the receive time and spectrum window monitored by the initiating device.</p>
15.323 (c) (11)	<p>Co-located device LBT:</p> <p>An initiating device that is prevented from monitoring during its intended transmit window due to monitoring system blocking from the transmissions of a co-located (within one meter) transmitter of the same system, may monitor the portions of the time and spectrum windows in which they intend to receive over a period of at least 10 milliseconds. The monitored time and spectrum window must total at least 50 percent of the 10 millisecond frame interval and the monitored spectrum must be within 1.25 MHz of the center frequency of channel(s) already occupied by that device or co-located co-operating devices. If the access criteria is met for the intended receive time and spectrum window under the above conditions, then transmission in the intended transmit window by the initiating device may commence.</p>

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To whom it may concern,

**Declarations**  
**FCC ID: OC631070**

I, the undersigned, hereby declare that

1. The device does not use the provisions of 47CFR 15.323 (c) (6), random waiting mechanism is not used in this system.
2. The provisions of 47CFR 15.323 (c) (10) and 47CFR 15.323 (c) (11) are not used to extend the range of spectrum occupied over space or time for the purpose of denying fair access to spectrum to other devices.
3. Only the handset will act as the initiating device(s), which will initiate the establishment of the duplex connection.
4. The device complies with the provisions of 47CFR 15.319(f). The device shall automatically discontinue transmission in case of either absence of information to transmit or operational failure. These provisions are not intended to preclude transmission of control and signaling information or use of repetitive codes used by certain digital technologies to complete frame or burst intervals. The following table explains the reaction of device in case of either absence of information to transmit or operational failure after a connection of its companion device is established.

	Circumstances	Reaction of Base Unit	Reaction of Handset
1	Switch-off device	NA	NA
2	Remove power from device	A	C
3	On Hook on device side	NA	C
4	Switch-off companion device	NA	NA
5	Remove power from companion device	B	A
6	On Hook by companion device	B	NA

- A – Connection is terminated and, transmission ceases.  
B – Connection is terminated but device transmits control or signaling information.  
C – Connection is terminated but companion device transmits control or signaling information.  
NA – Not applicable

If you have questions or need further information, please contact the undersigned.

Regards,

[Signature]

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[Title] Assistant to the President