



May 5, 2025

DATA REUSE: KDB inquiry, Tracking Number 718415

- **Introduction:**
- Reference Device is a module classified under 6CD equipment class with **FCC ID PD9BE200NG**
- FCC Rule parts: 15E, Frequency bands: 5955GHz – 7115GHz

- **Justification:**
- Adding an equipment class 6VL via software changes introduced recently in the rules.
- The operational differences between the variant and the reference device is only a mode of operation change by reducing Power/PSD when operating in VLP with dedicated power level.
- See data reuse justification:
using LPI (Low Power Indoor) and SP (Std Power) Levels as it is the most conservative case compared to VLP (Very Low Power) power.
- The following has been tested and is worst case based on higher output power:
- Frequency Stability - **FCC Part 15.407 (g)**
- Undesirable Emissions Limits (OOB, both Conducted and Radiated) - **FCC Part 15.407 (b) (5)**
- RF Exposure **FCC Part 2.1093**
- Not impacted by output power but already tested:
- Contention Based Protocol - **FCC Part 15.407 (d) (6)**
- The VLP specific testing would be (due to reduced output power and needs to show compliance to specific VLP requirements limits):
- In-Band Emissions (Mask) - **FCC Part 15.407 (b) (6)**
- Occupied Bandwidth – **FCC Part 15.407 (a) (10)**
- Maximum Output Power – **FCC 15.407 (a) (8)**
- Power Spectral Density – **FCC 15.407 (a) (8)**



Cross Reference

Reference Device		Variant Device		Key differences	
FCC ID PD9BE200NG		FCC ID PD9BE200NG		SW change by reducing Power/PSD when operating in VLP	
Items	Rule Part	Test item	Test Report	Data Referencing	Comments
1	15.407 (b) (6)	In-Band Emissions (Mask)	241030-02.TR02	N	
2	15.407 (g)	Frequency Stability	230526-08.TR104	Y	Same as item 1. Spot-check is unnecessary
3	15.407 (b) (5)	Undesirable Emissions Limits (Out of Band, both Conducted and Radiated)	230526-08.TR104 230526-08.TR20	Y	Same as item 1. Spot-check is unnecessary
4	2.1093	RF Exposure	230526-08.TR12	Y	Same as item 1. Spot-check is unnecessary
5	15.407 (d) (6)	Contention Based Protocol	230526-08.TR104	Y	Not impacted by output power. Spot-check is unnecessary
6	15.407 (a) (10)	Occupied Bandwidth	241030-02.TR02	N	Impacted by output power reduction
7	15.407 (a) (8)	Maximum Output Power	241030-02.TR02	N	Same as item 6
8	15.407 (a) (8)	Power Spectral Density	241030-02.TR02	N	Same as item 6
9	15.407 (a) (8)	Transmit Power Control	241030-02.TR02	N	Refer to TPC operational description