

From: LabHelp [<mailto:LabHelp@fcc.gov>]

>Sent: Thursday, September 16, 2004 5:09 AM

>To: david@waitt.us

>Subject: RE: Change from 802.11 UNII to ISM

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>Question:

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>I have a client who has a IEEE802.11 A/B/G access point that is currently

>certified under part 15.247 for 802.11 B/G (2.4GHz) and 15.407

>(UNII) for 802.11 A (5.15-5.25GHz, 5.25-5.35GHz and 5725-5.825GHz)

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>The client would like to now operate the upper band (5.725 - 5.825) as ISM

>under 15.247. In addition they would like to add the additional band of

>5.825-5.85GHz to the ISM certification under 15.247.

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>I understand that operation between 5.825 - 5.85 GHz can be added with a

>Class II permissive change,

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>My question is can I change the rule part that the device is certified under

>for the entire 5.725-5.825 band to ISM (15.247) with the permissive change

>as well?

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>There will be NO HARDWARE changes to the accesspoint to accomplish this.

>The only change required is a software change.

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>Answer:

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>Since there is no hardware change, you can add the new frequency band to the

>filings so long as the change does not require a new authorization.

>A new authorization is required if the output power on the new frequencies

>exceed the original grant. Also, if operation on the new frequencies

>requires a new filing for RF safety reasons, then a new filing is required.

>For example, operation on the new frequencies proposes portable use when the

>original grant was mobile.

>Finally, the software change can only be done by the manufacturer prior to

>marketing. If the software change will be performed by the end user, then

>it is a Software Defined Radio(SDR) and a new filing as an SDR is

>required.