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Corey Cahill
Federal Communications Commission
45 L Street NE
Washington, DC 20554
United States of America

25th September 2024

Subject: **Response to FCC Correspondence 598540**

Dear Corey,

Thank you for your inquiry regarding the grant of FCC ID YETI44-1M34CNU (this FCC ID and the related FCC ID YETI41-RECU, collectively the "CEL-FI QUATRA 4000c" device) for operation in the 3550-3700 MHz CBRS band 48, specifically concerning their classification as End User Devices ("EUDs").

There is an OET inquiry Tracing Number: **479448** for booster operating according to Part96.

The CEL-FI QUATRA 4000c is an Industrial Signal Booster. This device was approved by the FCC on 3/17/2023 and operates in accordance with its authorization.[1] The Grant of Equipment Authorization specifically references that "This device is a part of a booster system operated with FCC ID: YETI41-RECU." This is further detailed in the user manual submitted with the application, which states that the two models that make up the CEL-FI QUATRA 4000c are the NU (YETI44-1M34CNU) and the CU (YETI41-RECU).

In accordance with 47 CFR 20.21 and per KDB 935210 D02 Signal Boosters Certification v04r02, Section IV(h)(3) (cited below for reference), the CEL-FI QUATRA 4000c device can boost Part 96 (Citizen Broadband Radio Services) signals. The KDB guidance is very clear as to the operation of a signal booster for Part 96 operation. When the EIRP is greater than 23dBm, SAS registration is required. When the EIRP is less than 23dBm, no SAS registration is required and EUD requirements shall be followed.

The QUATRA 4000c has been verified to not transmit any signal unless it confirms the PLMN-ID of the base station signal per KDB 935210 D04 Provider Specific Booster Measurements v02r04. The base station, a Citizens Broadband radio Service Device (CBSD), is under the complete control of the Spectrum Access System (SAS) for 3550-3700 MHz band signal for CEL-FI QUATRA 4000c. Consequently, the SAS regulates all transmissions of the CEL-FI QUATRA 4000c in the 3550-3700 MHz CBRS band 48. Therefore, the QUATRA 4000c device goes beyond the requirements outlined in KDB 935210.

Once the SAS grants requested channel access to the CBSD, the CEL-FI QUATRA 4000c's EIRP (Effective Isotropic Radiated Power) remains below 23 dBm when communicating with a CBSD or a

[1] The FCC inquiry references "processing" the referenced application, noting that the application may be dismissed for failure to provide the requested information. Nextivity clarifies that it does not currently have a pending application processing before the FCC for the FCC IDs referenced in this letter.

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CBRS User Equipment (UE), classifying it as an EUD per KDB 935210 D02 Signal Boosters Certification v04r02.

Based on the above understanding, we believe that the CEL-FI QUATRA 4000c operates fully in accordance with FCC requirements, and is not an intermediate device link.

We believe this clarifies your inquiry. Please let us know if you have any further questions/concerns.

Best regards,

Nextivity Inc.

(3) Sec. 20.21 applies for boosters (including DAS) intended for Part 96 (Citizens Broadband Radio Service) operations.[8]

(i) Testing shall generally follow KDB Publications 940660 [R38], 935210 D05, and 935210 D02.

(ii) Applicable Part 96 equipment types:

- EIRP > 23 dBm / 10 MHz: CBSD requirements apply, including register with and follow SAS directions.[9]
- EIRP < 23 dBm / 10 MHz: EUD requirements apply for operation with a CBSD.