

From: peter black

To: Nimesh Sangani

Date: July 02, 2021

Subject: Additional Information Request

Message:

Please find response below. A full response document was prepared including measurement setup and results in pdf format. Could not find a file upload option so copied the major text portions below, will forwarded document separately for consideration.

Firstly there is one errata on the application.

Errata: Application correction.

• Requested TX output power for outdoor is 20mW (13dBm), consistent with the approved indoor license (711-EX-CN-2020).

Question: Explanation of how you would coordinate any usage with a Spectrum Access System (SAS).

Question: Explanation of how you would specifically avoid causing interference to incumbent and commercial operations in the band, including General Authorized Access (GAA).

XCOM Response:

• The outdoor system is temporary only (tripod mounted indoor RRU's), operated for limited duration and will not be setup overnight.

• Prior to conducting any testing the spectrum will be scanned. This should be sufficient to coordinate with SAS grant updates given the daily CPAL schedule (CBRSA TS-2001 6.2).

• RF survey was completed to evaluate current spectrum usage – no active CBSDs were detected (Refer section 1 below – spectrum survey results).

• The RRU's will be down pointed (see testing results), operated at low power to minimize coverage – please note the updated TX power request of 20mW.

• Interference will be mitigated/avoided but limiting interference to a small coverage area (Refer to section 2 below - emission test results)

• At a distance 30m range the RSSI is below the -80dBm/10MHz interference limits for SAS managed GAA/PAL CBSDs (Refer to FCC Title 45, Chapter 1, Vol 5, Part 96.41).

• At distance > 100m from RRU, emissions will be < 54dBuV/m (500 uV/m). This is below the FCC General Emission Limit of 500uV/m (refer to FCC Emission Part 15 Subpart C 15.209 & 15.205).