

4/9/2024

Federal Communications Commissions Authorization and Evaluation Division 7435 Oakland Mills Road Columbia, MD 21046

RE: Part 15 Subpart E U-NII 6GHz Attestation Letter

## To Whom it May Concern

We, Microsoft Corp, attest that this device under FCC ID: C3K2036 and C3K2037 complies with the device protocol requirements and operational restrictions noted in Part 15E of the FCC's rules for 6GHz bands for Dual Client 6CD.

## We attest the following;

- 1. This device receives the associated client/subordinate of its permitted maximum power correctly.
- 2. This device will only associate and connect with a low-power indoor Access Point, subordinate device, or standard access point and never directly link to any other client devices.
- 3. This device will always initiate transmission under the control of a low power indoor AP or subordinate or standard client except access point for brief communications before joining a network. These quick messages will only occur if the client has detected an indoor AP, subordinate, or standard access point operating on a channel. These brief messages will have a time-out mechanism such that if it does not receive a response from an AP it will not continually repeat the request.
- 4. This device, when associated and connected with a low-power indoor access point, subordinate or standard access point device in the 6GHz band, will operate at a power lower as advertised by the indoor access point, subordinate, or standard access point:
  - i. lower than or equal to the power advertised by the low-power indoor access point or subordinate and never above the maximum output power allowed by the FCC grant for clients associated with indoor clients or subordinates.
    - ii. lower than or 6 dB below the power advertised by the standard access point.



- 5. This device is prohibited for control of or communications with unmanned aircraft systems, including drones.
- 6. This device only punctures to optimize network performance and never to avoid licensed incumbents. If a licensed incumbent is detected, the equipment will either use bandwidth reduction or a complete move of the channel for avoidance. If a channel is punctured in order to optimize network performance, it will continue to use CBP in the punctured region.
- 7. This device will not connect directly to another client device using 5.850-5.895 GHz frequencies. Hotspot Mode, ad-hoc and any other P2P service is disabled for U-NII-4 operations in the 5.850-5.895 GHz band.
- 8. For U-NII-4 operations in the 5.850-5.895 GHz band, this device will only associate and connect with an indoor AP or indoor Subordinate.
- 9. For U-NII-4 operations in the 5.850-5.895 GHz band, this device will always be under the control of an indoor AP. However, there may exist situations where this device may transmit brief messages, prior to being under the control of an AP, to join an AP network. But these brief messages will only occur if this device has detected a signal confirming that an AP is operating on a particular channel. These brief messages will have a time-out mechanism if it does not receive a response from an AP.

Should you have any questions or comments concerning the above, please contact the undersigned.

Sincerely,

Nawrin Islam Natasha **Compliance Engineer,** 

Microsoft Corporation.