Mark Briggs

From: Andrew Leimer [Andrew.Leimer@fcc.gov]
Sent: Thursday, November 13, 2008 12:09 PM
To: Mark Briggs
Cc: Steven Dayhoff
Subject: RE: C2PC and DFS testing

Reference KDB 800580:

A class II permissive change is permitted as stated. The test plan references DFS testing based on the power of the modified device. This is not necessary based on the Class II permissive change policy (see below). However you must verify that the radar detection threshold is compliant. It is recommended that you verify this with a Bin 1 signal set to the proper threshold. You can then compare the results to the original filing. If they are comparable no further DFS testing is required. Bin 1 is sufficient for this test since all parameters are fixed so that a good statistical comparison can be made. Please document this in the approval by referencing the KDB and this E-mail addendum to the KDB.

Proxim is still has the Grantee Code blocked. For further information you will have to contact Rashmi Doshi.

Regards,

Andy Leimer
FCC/OET/EAB

The "remeasurement" tolerance policy of +/- 0.5 dB conducted and +/-3 dB radiated for Class II permissive changes (C2PC) has been superceded by KDB291699 which also applies to Class II permissive changes (although not specifically stated). The KDB states the following:

Grantees must coordinate with Test labs to ensure all samples for EMC, HAC and SAR are tested at maximum output conditions as required by the applicable test procedures. The output power measured for EMC and SAR may vary due to differences in test procedures and requirements. The measured values may not be directly comparable unless the same identical procedures are applied; for example, peak, average, bandwidth, modulation, operating modes, data rates and frame/bit patterns etc. It is the grantee's responsibility to ensure all test samples are operating within tune-up requirements (accepted for the filing) and test results will support compliance for all production units. Although the measured output power may vary with the equipment and setup used, it is the responsibility of grantee and test labs to ensure that the devices selected for testing are in accordance with 2.907.

In addition KDB178919 (Permissive Changes) states in Paragraph 4)c) the following:

c) A Class II permissive change for a version of a device with a decrease in output power or different field strength is allowed under the following conditions.
i) The Maximum Output power rating of the original does not change and there is no increase in the original maximum output power rating.
ii) No design change to increase or decrease output power. A decrease in power setting configuration acceptable.
iii) In no case can a power limit be exceeded.

Please note that power differences in C2PCs that exceed the old "remeasurement" tolerance will raise questions in FCC filings and TCB audits.

From: Mark Briggs [mailto:mark.briggs@ntscorp.com]
Sent: Thursday, November 13, 2008 1:17 PM
To: Andrew Leimer
Subject: RE: C2PC and DFS testing

Andy –

I already did but the response that came back was “yes you can do a C2PC” and not “yes you can do a C2PC and the plan is ok”. I’ll reply to the response, asking to OK the test plan … the tracking number is: 800580

Thanks,

Mark

From: Andrew Leimer [mailto:Andrew.Leimer@fcc.gov]
Sent: Thursday, November 13, 2008 9:24 AM
To: Mark Briggs
Subject: RE: C2PC and DFS testing

Mark,

Could you submit this to the KDB.

Thanks,
Andy

From: Mark Briggs [mailto:mark.briggs@ntscorp.com]
Sent: Thursday, November 13, 2008 11:54 AM
To: Andrew Leimer
Subject: C2PC and DFS testing

Hi Andy –

I have a product where they will be adding a second antenna port to make use of the spatial diversity switch on the module they use. Only one antenna port would be active at a time, this is not a MIMO device.

I would like to propose that if I check output power on both the existing and then the new port and find that the new port is within 0.5dB of the existing port we do a rudimentary check of DFS threshold on radar type 1 only, just to confirm there is no issue with that second receive chain. If the output power is more than 0.5dB lower, but less than 1dB lower I would check radar types 1, 5 and the worst case from the previous report, if more than 1dB lower check all radar detection thresholds. I do not plan on doing any timing checks since they are algorithm dependent and not threshold dependent.

How does this sound to you ?

Mark

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