

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

Date: April 21st, 2023

Ref: Cover letter (C2PC)

FCC ID: IPH-03910

To whom it may concern:

Garmin International Inc. requests a Class 2 Permissive Change to FCC to enable the bands UNII-2A (5250 MHz to 5350 MHz) and UNII-2C (5470 MHz to 5725 MHz) and to include the DFS function. The FCC Part 15 Subpart E rules require a DFS (Dynamic Frequency Selection) function for Unlicensed National Information Infrastructure (U-NII) equipment that operates in the frequency bands of 5250 MHz to 5350 MHz and/or 5470 MHz to 5725 MHz to avoid co-channel operations with radar systems. Also, the C2PC includes a reduction of the output power of ax mode without beamforming for the frequency bands 5180 - 5240 MHz (UNII-1) and 5745 - 5825 MHz (UNII-3).

This DFS function is enabled via software on NXP 88Q9098 for FCC ID: IPH-03910. This allows the use of wideband digital modulation techniques and provides a wide array of high data rate mobile and fixed communications.

Garmin International, Inc.

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Sincerely,

William H. Pertner

Compliance Engineering Team Leader

Garmin International, Inc.