



Date: October 8, 2021

**Federal Communications Commission  
Authorization and Evaluation Division**

7435 Oakland Mills Rd  
Columbia MD 21046-1609

**Subject: Letter of Declaration on LPI Operation  
FCC ID: LDKMU6CR2417**

Product Name: Cisco Catalyst 9136I Access Point

To whom it may concern:

We the undersigned, hereby attest that this device complies with the following requirements of Part 15E of the FCC's rules for the 6GHz bands:

- a.) Statement describing the method the indoor access point uses to control the associated client/subordinate power control.

**Indoor Access Point 6ID:**

1. Protocol attestation statement:
  - a. Statement for modules only: Contention-Based Protocol, as demonstrated in the test report, is permanently embedded in the module and is not host-dependent.
  - b. Statement describing the method the indoor access point uses to control the associated client/subordinate power control.
2. Statement acknowledging device restrictions:
  - a. Low-power indoor Access Point. Access Point operating in the 5.925-7.125 GHz band shall be supplied power from a wired connection, has an integrated antenna, is not battery-powered, and does not have a weatherized enclosure.
  - b. This device's operation will not be allowed on oil platforms, cars, trains, boats, and aircraft, except that operation of this device is permitted in large aircraft while flying above 10,000 feet.
  - c. Indoor access points are prohibited for control of or communications with unmanned aircraft systems, including drones.

Protocol attestation statement:

1. Contention-based protocol, as demonstrated in the test report, is permanently embedded in the chip (BCM43684) and is not host-dependent.
2. An 11ax IEEE AP's Transmit Power Envelope element has information fields for power limits for connecting client/subordinate devices. The TPE information is contained in this device signals and used by connecting client/subordinate to ensure that it knows the regulatory TX powers it is allowed to transmit at. There is a regulatory info field in this device beacon and probe response frames which details this device type when the client/subordinate associates to this device. (Refer to Operation Description for detailed information).

Statement acknowledging device restrictions:

1. This device was supplied power from a wired connection, has an integrated antenna, is not battery-powered, and does not have a weatherized enclosure.
2. This device's operation will not be allowed on oil platforms, cars, trains, boats, and aircraft, except that operation of this device is permitted in large aircraft while flying above 10,000 feet.
3. This device is prohibited for control of or communications with unmanned aircraft systems, including drones.

1. Protocol attestation statement:

The device designs meet the IEEE requirements of sending regulatory info in TPE.

- An 11ax IEEE AP's TPE element has information fields for EIRP/PSD limits for



connecting client devices. The TPE information is contained in the AP signals

(e.g.. beacon, probe response , FILS Discovery frames and the Reduced Neighbour Report element) and used by connecting clients to ensure that it knows the regulatory TX powers it is allowed to transmit at.

- In addition there is a "regulatory field" in the AP beacon and probe response frames which details the AP type when the client associates to the AP.
- Both the "regulatory field" and the TPE element are included in the same message and both are mandatory for IEEE devices.
- At association an 11ax client device will always know what type of AP it is connecting to.

2. Statement acknowledging device restrictions:

a. Low-power indoor Access Point. Access Point operating in the 5.925-7.125 GHz band shall be supplied power from a wired connection, has an integrated antenna, is not battery powered, and does not have a weatherized enclosure.

b. This device's operation will not be allowed on oil platforms, cars, trains, boats, and aircraft, except that operation of this device is permitted in large aircraft while flying above 10,000 feet.

c. Indoor access points are prohibited for control of or communications with unmanned aircraft systems, including drones.

Sincerely,

Applicant : Cisco Systems Inc  
Address : 125 West Tasman Drive, San Jose, California 95134-1706, United States

Signature : 

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Name and Job Title. : Haiwen Lu, Compliance engineer  
E-mail : haiwlu@cisco.com  
Tel. : +86 21-2405-7511