

To: Dave Guidotti <daveg@elliottlabs.com>  
From: "Timothy R. Johnson" <tjohnson@AmericanTCB.com>  
Subject: Re: Fwd: Response to Inquiry to FCC (Tracking Number 514157) (Cisco)  
Cc: fleffing@cisco.com

Dave/Fred,

We are nearing completion of this application. However there are 2 last concerns that we want to see addressed.

1) The first is that the test report shows 20 MHz testing, but Dave had provided a brief email response that he stated was from Cisco that 20 MHz bandwidths will not be supported and why. We would like to see something more formal/direct from Cisco (attestation, cover letter, etc.) addressing this issue, or alternatively update the test report for removal of this information. In short, something to more adequately document the filing better.

2) The second is in regards to the aggregate combination of channels (note this was addressed in the first set of comments, but the response appears that it may not adequately answer the question) per the following rules.

90.1213 - The following channel center frequencies are permitted to be aggregated for channel bandwidths of 5, 10, 15 or 20 MHz. Channel numbers 1 through 5 and 15 through 18 are 1 MHz channels and channels numbers 6 through 14 are 5 MHz channels.

From the manual it does not appear that this device is meeting the above requirement by aggregate channels with the appropriate center frequencies. For instance using a 5 MHz channel at 4952.5 MHz and adding one more 5 MHz aggregate channel at 4947.5 or 4957.5 would provide a new 10 MHz bandwidth centered on 4950 MHz or 4955 MHz. This does not appear to be occurring given the test data provided, but instead it appears that a wider bandwidth is occurring only at the center channel, instead of an aggregate bandwidth across appropriate channels.

Therefore it appears the channelization requirements are not being met for the following:

5 MHz channel at 4986.5  
10 MHz channels in general.

Please provide further information as necessary to show the appropriate aggregate channelization is taking place. Alternatively, does Cisco have further information from the FCC showing the bandwidth may simply be centered on the frequencies given in the table instead of across aggregate channels as cited in the rules?

FYI.....Please note that I am currently located in Taipei but can be reached at 404-414-8071 (Local USA Number transfers to Taipei - at a 12 hour ahead time difference Eastern Standard Time, 15 hours ahead California time). I have also discussed these issues with Bill Graff (CB) as well. You may alternatively give him a call state side to discuss these issues as necessary at 480-459-6706.

Tim

Timothy R. Johnson, NARTE Certified EMC Engineer (No. EMC-002205-NE)  
Examining Engineer  
American TCB, Inc.  
6731 Whittier Ave.  
McLean, VA 22101

email: tjohnson@AmericanTCB.com  
alternate email: TRJ@adelphia.net

USA direct number: 404-414-8071 & 703-310-6868

USA corporate phone: 703-847-4700

USA corporate fax: 703-847-6888

Taiwan phone: (02) 2658-5152 ext 306

Taiwan Cell: 0920-399-260