TCB Correspondence

Combined FCC ISED item: The conducted lower band edge data includes plots with reference to channel power measurements, however the measurements included in the report do not appear to be standard measurement procedures included in ANSI C63.10. Please clarify the measurement procedure(s) used. Ref: FCC Report pp 45-51 and similar section in RSS-247 report. Standard ref: ANSI C63.10 11.13.3.4 steps j and l.	Due to the nature of the signal, test method prescribed in AN63.10 could not faithfully present the requirement of 15.247 (d) *In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits* Channel power function was utilized to measure power in 100kHz bandwidth and compared to the maximum 100kHz power within the transmit band. The trace averaging with correction added of 11.13.3.4 is NOT used because the limit 30 dB is a relative limit, ie if applied, the duty cycle correction of in band emission will negate the duty cycle of out of band emission. Updated report provided including clarifying remarks.	EW 100919 CKC 10/24/19