

July 5, 2018

To: Telefication B.V.  
Attn: Dept. FCC TCB  
Edisonstraat 12A  
6902 PK ZEVENAAR  
The Netherlands

## **Declaration Letter**

I believe we need to declare that this equipment (FCC ID: NEOD2107L2017F), supporting LTE FDD Band 66 cannot be consider as "fixed stations" as defined in FCC 14-31.

According to FCC 14-31:

- "The AWS-3 NPRM proposed to prohibit fixed stations in the 1695-1710MHz and 1755-1780MHz bands"
- "A fixed station is "a station in the fixed service," which consists of stations at specified fixed points that communicate with each other. 47 C.F.R. § 27.4"

According to . 47 C.F.R. § 27.4:

- "Fixed service. A radio communication service between specified fixed points.  
Fixed station. A station in the fixed service"

We need to declare that this equipment (FCC ID: NEOD2107L2017F), supporting LTE FDD Band 66, the equipment does not "communicate with each other" and therefore doses not support "Fixed service" and could not be consider as "fixed stations" for communicating "Fixed service" as defined in FCC 14-31.

We need to declare that this equipment (FCC ID: NEOD2107L2017F), supporting LTE FDD Band 66, the equipment only retransmits FCC approved "portable stations" in the 1755-1780 MHz bands which are required to complies with the following:

- FCC rule Part 27.75(a) (1) as a portable station:
  - Mobile and portable stations that operate on any portion of frequencies in the paired 1755-1780 MHz and 2155-2180 MHz band must be capable of operating on all frequencies in the paired 1710-1780 MHz and 2110-2180 MHz band, using the same air interfaces that the equipment utilizes on any frequencies in the paired 1710-1780 MHz and 2110-2180 MHz band.
- FCC rule Part 27.77 as a portable station:
  - Mobile and portable stations in the 1695-1710 MHz and 1755-1780 MHz bands may operate only when under the control of a base station. Base stations that enable mobile or portable equipment to operate in the 1695-1710 MHz and 1755-1780 MHz band are subject to prior coordination requirements.

Kind regards,

**Amir Meir**

**Cobham Wireless**

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