September 7, 2014

Federal Communication Commission
Office of Engineering and Technology
USA

RE: FCC ID:NEODMBR30073008PS
Form 731 CN: EA714755
Subject: CRN46302

Dear Mr. Rodriguez,

Please find attached our response according to your questions.

1. Per Sections 90.20(c)(3), 90.521, 90.531 first paragraph, etc., routine licensing and governing technical standards for Public Safety **Narrowband operations are not presently specified for 758-769 and 788-798 MHz** [i.e., FirstNet spectrum; FCC-13-137, DA-12-1462, etc.].
Therefore these bands should not be listed on a Form 731 for Part 90 Public Safety Narrowband equipment absent specific justification in the filing [see KDB pub. 634817; Section 2.962(c)(5) along with Jan. 2014 FCC-TCB conference notes; Section 2.962(f)(1)].
Where listing of narrowband operations in 758-769 and 788-798 MHz qualifies, the following grant note will be used: "This filing includes compliance information and test data for incumbent public safety narrowband operations in Public Safety Broadband (FirstNet) spectrum."
Consistent with KDB pub. 634817, in this case also at minimum test data must be provided for channels within the Public Safety Narrowband spectrum (769-775 MHz).
Response: This is a 90.219 class B device and has a pass band that exceeds 75 kHz. The application is filled out for contiguous bands as allowed in KDB pub. 634817 and the test data represents frequencies according to II(f)(2) of KDB pub. 634817. We applied for BB booster approval and got the questions for NB booster. Please clarify.

F_L (MHz)	–	F_H (MHz)	Rule(s)
758	–	768	90-R, Public Safety (PS) Broadband (FirstNet)
768	–	769	PS Guardband
769	–	775	PS Narrowband
788	–	798	90-R, Public Safety (PS) Broadband (FirstNet)
798	–	799	PS Guardband
799	–	805	PS Narrowband

2. FCC RF Exposure Limits – User manual and RF Exposure exhibit are not in agreement for minimum separation distance. Please correct.

Response: The user manual was adjusted for 35 cm safe distance, please refer to file User_manual_25633_rev1 uploaded on Sept. 8, 2014.

3. Please review and clarify the User Manual equations for determining Max Donor and Server antenna gain. The arithmetic found in example equations does not appear to be correct i.e. “37 - (33-6-3) = 0 dBd “. Please also clarify the intent of these equations. Are the equations written as such to limit the ERP to 37dbm or some other value?
Response: . The equations were corrected, please refer to file User_manual_25633_rev1. The intent of these equation is to provide the operator with the proper tools to make sure that the booster's deployment will be according to the FCC rules.
FCC states that the maximum allowed ERP is 37 dBm, since the repeater is tested as a device, the operator needs to be informed that all peripheral devices (i.e. cables, antennas etc.) should be properly selected in order to meet FCC ERP limits.

4. Output Power section should be amended to indicate measurements are max conducted output power not radiated power if in fact measurements were done at the antenna port as suggested by test setup figure. This includes summary table which has column for “Maximum ERP”..

Response: The test report was corrected, please see AXERAD_FCC.25633_rev3 uploaded on Sept. 8, 2014.

5 Test report does not show data demonstrating compliance with 90.219(e)(2) noise figure limit of 9dB. Please amend Test Report to include.

Response: The test report was amended, please refer to section 7.8 of AXERAD_FCC.25633_rev3.

6 As indicated in KDB Pub KDB 935210 D02, at present time eqpt. filings in 806-809/851-854 (NPSPAC) remain prohibited unless compliance is shown for Mask H (DA-13-1803 docket no. 13-209). Please amend test report to show compliance with this rule part.

Response: The test report was amended, please refer to section 7.7 of AXERAD_FCC.25633_rev3. The test report updated to show compliance for C4FM and analog FM types of modulation.

PS! Would you be so kind to send your comments to Applicant Mr. Raviv Cohen,
e-mail address: Raviv.Cohen@axellwireless.com, authorized person for this filing and not to Mr. Peter Bradfield recorded in the FCC database?

Sincerely yours,

Raviv Cohen, R&D Engineer
Axell Wireless Israel Ltd.

M. Nikishin, EMC and Radio group manager
Hermon Laboratories Ltd.