March 9, 2007

Mr. Richard Tseng
Federal Communications Commission
7435 Oakland Mills Road
Columbia, Maryland 21046

Re: FCC ID: PD9LEN4965AGN

Applicant: Intel Corporation
Correspondence Reference Number: 36496
731 Confirmation Number: TC444123
Date of Original Email: 02/28/2007

Subject: Quick review

1) Please submit expanded plots for the channel transmission closing time demonstrating that the device vacates the channel in the required 200 ms. These plots should not have a sweep greater than 600 ms.
Answer from CCS:

The requirement for a 600 msec sweep time plot was presented in material referenced in an email announcement from admin@tcbcouncil.org sent on February 27, 2007. This email also included instructions and the password required to download these materials. Attendees at this TCBC training were informed of this requirement during the week of February 22, 2007. The Grant was issued on February 9, 2007, which is prior to either of these dates.

We do not believe that it is appropriate to retroactively apply the 600 msec requirement. We will gladly comply with the additional reporting requirement for all applications submitted on or after February 28, 2007.

We further believe that the existing plots are sufficient to demonstrate compliance with the 200 msec closing time requirement for this particular device, as explained by our response to the questions that were asked prior to issuing the Grant.

2) The device has multiple antenna ports. Can all ports be used at the same time? How do the configurations impact the antenna gain?
Answers:

This product utilizes multiple Tx and Rx ports as shown in test report and functional description this product is a 2x3 802.11a/b/g/draft n product. Only 2 antenna connectors (connectors 1 & 2) are on the Tx chains and the 3 antenna connectors are on the Rx chains (connectors 1, 2 & 3). Tx chains attached to antenna connectors 1 and 2 can operate at the same time using Cyclic-Delay Diversity (CDD) and this has little to no effect on antenna gain (less than 1dB).

3) All modes of operation must be tested. The DFS test report only conducted tests in 20 MHz. The approved master device used in the test does not have 40 MHz operation. Please submit updated information on the 40 MHz BW operation.
Answers:

a) This product operates as a client-only device, when associated with a master device and the master detects a radar event the master device will send a communication to the client device showing that it saw a radar event and to close and move channel. The client device regardless of channel bandwidth when associated with a master device will receive communications and respond accordingly.
It is understood that there are some master devices that have shown non-compliance, but this is from a detection point of view. If the master device detects the radar event it will send the notification to the client and the client will react accordingly.

b) There are currently no master devices that operate in this frequency range and in these modes available that are approved by the FCC.

Testing this mode using a FCC approved AP is not possible at this time and, in reference to answer 3a, does not seem to be applicable.

4) Can you clarify how users are prevented from disabling DFS and/or transmitting in frequencies not authorized in United States?
Answer:

This information is programmed into the EEPROM and the end user does not have access to the EEPROM and can not override this function.

Please do not hesitate to contact us if there are any further questions and/or comments.

Sincerely,

Marissa Faustino
Compliance Engineer

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