

Pace Americas, Inc.
310 Providence Mine Road
Nevada City, CA 95959



June 16, 2014

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Attn: OET Dept.
Re: FCC ID: PGR5200AC

To Whom It May Concern:

Pace Americas asserts that this device meets all requirements listed below as specified in FCC Part 15 Subpart E Rules required for Unlicensed – National Information Infrastructure (U-NII) equipment that operates in the frequency bands 5.250 GHz to 5.350 GHz and/or 5.470 GHz to 5.725 GHz for DFS operation as outlined in FCC 06-96 Appendix and FCC KDB Publication 443999 D01 Approval of DFS UNII devices v01 "Interim Plans to Approve UNII Devices Operations in the 5470 – 5725 MHz Band with Radar Detection and DFS Capabilities".

Transmit Power Control:

A PA detector voltage feedback to the ADC input and ADC input will adjust the gain setting to control the power based on the feedback voltage. In the production line the TX calibration is used to collect power vs detector voltage so that every device can control TX power accurately. In addition a per packet power control function is enabled. This function monitors the EIRP power level and reduces the close loop power as much as 6db (24dBm EIRP) when deemed the client device does not need the full power setting.

Uniform Channel Spreading:

Channel spreading is taken care of by a proprietary Channel Selection Algorithm. The algorithm will scan all channels for the number of active devices and level of occupancy and airtime usage and selects the one least occupied. This will ensure spreading of the interference amongst the various channels allocated by regulators.

Restricted Bands:

This device will not transmit on channels which overlap the 5600 –5650 MHz band as specified in the FCC KDB notice 443999 D01 Approval of DFS UNII devices v01 "Interim Plans to Approve UNII Devices Operations in the 5470 – 5725 MHz Band with Radar Detection and DFS Capabilities"..

Software Configuration Control:

The 5200 family 802.11ac wireless uDSL broadband residential gateway's embedded software is implemented to support bonded uDSL broadband router and/or bridge functions depending on its configuration to be offered by the service provider. The service provider configuration in the embedded software is hardcoded to configure the broadband router for the service providers network and to enable/disable specific software features that the service provide wants to make available to its customers. The end user has limited control via a HTTP GUI (Graphical user interface) over the router and radio configurations on how it may impact their local area network (wired and wireless) arrangement. Pace controls and provides the ability to configure which mode the integrated radios operate in: 802.11b/g, 802.11n, or 802.11ac.

Sincerely,

A handwritten signature in black ink that reads "Mark A. Rieger".

Mark A. Rieger
Staff, Regulator Certifications Engineer
Pace Americas
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