

ARRIS
310 Providence Mine Road
Nevada City, CA 95959
Tel: 530 274 5400
Fax: 530 273 6340



March 14, 2017

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Subject: DFS Expedite Request

Reference:

- Model 5268AC FCC ID: PGR5200AC
- Model BGW210 FCC ID: PGRBGW210

Dear Sir/Madam,

The devices referenced above are subject to the FCC's internal evaluation of DFS functions.

The model 5268AC has been granted twice under the SDR process which required a pre-grant DFS FCC audit each time. The first grant was issued on 7/10/2014. The second grant was issued on 4/15/2016 under the "New Rules" ET Docket No. 13-49 (2014).

The BGW210 DFS/UNII-2 pre-grant authorization is currently pending approval with the Commission.

Since there are many similarities between the two Models (fit, form, & function), and the DFS functions are identical as summarized in the table below, we are requesting an exemption to the pre-grant DFS sample audit to expedite this effort. The full BGW210 DFS test report(s) are included in the SDR Class III Permissive Change submittal.

This information is being provided to allow the FCC to determine if any DFS pre-grant sample internal evaluation is required on the Model BGW210 versus that which can be covered by the previous pre-grant sample testing already performed on the Model 5268AC.

Sincerely,

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

Mark Rieger
Principal Hardware Engineer
Regulatory compliance and conformance

ARRIS
310 Providence Mine Road, Ste. 200, Nevada City, CA 95959 USA

o: +1 530-274-5440
c: +1 530-575-6010
e: mark.rieger@arris.com



DFS Similarities and Differences

<p>Previously Granted: FCC ID: PGR5200AC</p>	<p>New device: FCC ID: PGRBGW210</p>
<p>Technology: IEEE 802.11ac Model 5268AC Wireless / uDSL Residential Gateway</p>	<p>Technology: IEEE 802.11ac Model BGW21-700 Wireless / uDSL Residential Gateway</p>
<p>Bandwidths: 20/40/80 MHz (160 MHz is not supported)</p>	<p>Bandwidths: 20/40/80 MHz (160 MHz is not supported)</p>
<p>Antenna: DFS detection is only on Chain 1 (a stamped metal ARRIS proprietary dual band dual feed mounted directly to the PCB with peak gain of 1.9dBi) This antenna is mounted to PCB at or near the top of the unit.</p>	<p>Antenna: DFS detection is only on Chain 1 (a stamped metal Galtronics dipole mounted directly to the PCB with peak gain of 3.05dBi). This antenna is mounted to PCB at or near the top of the unit.</p>
<p>DFS detection algorithms are identical on both units since they both use the identical firmware running on the same radio chipset:</p>	
<p>5GHz radio SoC (chipset): QT3840BC/QT2518B System SW Ver. 10.5.6.529330 5 GHz Radio SW Ver: v37.4.7.81 (Quantenna)</p>	<p>5GHz radio SoC (chipset): QT3840BC/QT2518B System SW Ver. 9.2.04d30 5 GHz Radio SW Ver: v37.4.7.81 (Quantenna)</p>
<p>Differences between products: The BGW210 is a cost reduction effort and next generation VDSL residential gateway to replace the 5268AC.</p> <ul style="list-style-type: none"> • Lower cost DSL SoC with integrated Ethernet Phy. • Enhanced FEM (Front End Module) to replace external PA's and LNA's • Increased Telecom surge protection circuits • Removal of HPNA support 	
<p>Original testing performed by: TUV Rheinland of North America, Inc. Pleasanton, CA Additional testing performed by: NTS (National Technical Systems) Fremont CA</p>	<p>Original testing performed by NTS (National Technical Systems) Fremont CA</p>