

## dward ATCB

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**From:** Generic Office of Engineering Technology [oetech@fccsun27w.fcc.gov]  
**Sent:** Monday, October 17, 2005 6:51 AM  
**To:** dward@atcb.com  
**Subject:** Response to Inquiry to FCC (Tracking Number 921893)

### **Inquiry:**

I have a PC2 application that changes software (not a software defined radio) to allow an existing part 21 device to fit into part 27. The changes also include extending the frequencies and adding an emissions designator. No hardware changes have been made to the device. The changes are as follows: The software change would: 1. Extend the lower frequency limit from 2500 MHz to 2496 MHz 2. Extend the upper frequency limit from 2686 MHz to 2690 MHz 3. Add the emissions designator of 4M96W7D for 5.5 MHz channel bandwidth. 4. Allow for a new channel frequency list that is compatible with the BRS/EBS channel plan. 5. change the rule part from part 21 to part 27 The Software upgrades to the Wireless product are performed by either the manufacturer or system operator technicians that have been trained to perform this procedure. Because of the number and extent of the changes (i.e. moving to a new rule part, adding emissions designator and extending the frequencies) some guidance from the FCC seems to be in order. Is this PC allowed to be done by a TCB? Are all of the changes allowed? Thanks Dennis Ward Evaluation Engineer American TCB Certification Resource for the Wireless Industry www.atcb.com 703-847-4700 fax 703-847-6888 direct - 703-880-4841 or 209-966-2145

### **Response:**

Since the changes are based on software only, and the hardware design is not modified, a Class 2 PC is acceptable to be filed and approved by a TCB.

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