

NextNet Wireless, Inc. reply to comments from May 3, 2005.

RE: FCC ID: PHX-RSU2510F\_ATCB002396

May 5, 2005

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1. FYI – Please note that as this is a Class B computer peripheral device under DoC as well as a licensed transmitter the 2-condition statement of 15.19(a) must be on the device. Please note that this statement cannot be in the manual as the device is clearly large enough to accommodate the statement. You should consider complying to the specific rule section for this requirement.

NextNet Wireless, Inc. will review the two condition statement to the RSU-2510-F product.

2. Please note that 27.50(h)(2) states “Mobile stations are limited to 2.0 watts EIRP. All user stations are limited to 2.0 watts transmitter output power.” While the conducted power has been shown to be less than 2 watts for user stations, the EIRP has not been shown to be less than 2W. Please provide information on the antenna gain of the device and please address the 2 W EIRP limit for mobile stations.

The NextNet Wireless, Inc. RSU-2510-F product being submitted for FCC certification is a customer premise equipment (CPE) product that has been designed for use in the home or office and is not suitable for operation in a “mobile” or automotive type application. From the definitions found in 47CFR27.4 (see definitions below), a “Temporary Fixed Broadband Station” accurately defines the NextNet Wireless, Inc. RSU-2510-F product. The power limits as specified in 47CFR27.50(h)(2) are for two different classifications of products. A mobile device as defined in the terms and definitions is limited to 2 watts of EIRP. The other classification of devices would be “all other CPE or user station products that are not mobiles” and these devices are limited to 2 watts of transmitter power. The NextNet Wireless, Inc. RSU-2510-F device complies to the FCC requirements for transmitter power as defined in 27.50(h)(2).

**§ 27.4 Terms and definitions.**

*Temporary fixed broadband station.* A broadband station used for the transmission of material from temporary unspecified points to a broadband station.

*Mobile station.* A station in the mobile service intended to be used while in motion or during halts at unspecified points.

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3. Please note that the antenna substitution information provided does not appear to agree with the method specified in TIA603 mentioned or the test procedure specified on page 45 of the report. TIA 603 methods stipulate that the field strength obtained by the receive antenna be reproduced by applying a signal into a substitution antenna. The reading is taken from the output of the signal generator or amp which fed the substitution antenna. The cable factor from the substitution antenna to the generator is then subtracted and the gain of the substitution antenna is added to give the ERP/EIRP. The data shown indicates additional factors are added that do not apply and the report does not explain how or what the substitution factor is or how it was derived. Please explain how the data relates to this accepted method (i.e. that mentioned on page 45 of the report) and why the receive antenna factor, cable, preamp and attenuator factors have been included in the measurement. Please explain how the substitution factor reported is derived and please provide evidence that the method used is a proper antenna substitution method.

Clarification of the antenna substitution method has been added to the Exhibit 6 Test Report Part 2 document and is found on page 34 of this new document. A revised Exhibit 6 Test Report Part 2r has been uploaded to the ATCB web site.

4. Please note that the spurious emissions limits for BRS stations is not simply  $43+10\log P$  as stated in the report. Please note page test report part 1 page 30 incorrectly quotes 27.53(l)(2). This has changed as of Jan 10, 2005. Please note that 27.53(l)(2) is for fixed stations. Please note that this is a mobile subscriber station and does not fall under this rule part. Please quote and provide appropriate test data for the correct section of 27.53 (i.e. 27.53 (l)(3) and (4)).

The rules stated in 27.53(l)(2) are for "fixed and temporary fixed digital stations". As described in question #2 above, the NextNet Wireless, Inc. RSU-2510-F product is classified as a temporary fixed device and as such complies to the requirements of the emission limits as detailed in 27.53(l)(2). Section 27.53(l)(3) does not apply as this is for devices "employing digital modulation for the primary purpose of transmitting video programming". The NextNet Wireless, Inc. RSU-2510-F is a non-broadcast transmitter that is not suitable for the intent of video programming broadcasting. Section 27.53(l)(4) is not applicable as this product is not a mobile device but a temporary fixed device.

5. Please address the emissions limits for this type device as specified in 27.53(l)(3) and (4).

The NextNet Wireless, Inc. RSU-2510-F device complies to the emissions limits as defined in the FCC rules of section 27.53(l)(2). The FCC rules, 27.53(l)(3) and 27.53(l)(4) are not applicable to this product submission.