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Applicant:	Aruba Networks, Inc.
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Question:

1) If not in filing already, as part of op desc exhibit, please describe transmit operations of each antenna configuration option (location and type for all antenna elements, diversity, beamforming, MIMO, etc)

Response:

1) The model 65 is shipped from the factory with 2 integral antennas and no external antenna connector options. The antennas are located in the articulating section of the access point shown in Figure 1 below. The antennas operate in diversity mode only with no other transmit modes possible.

Figure 1 : Integral Antenna Locations

Question:

2) RF exposure exhibit indicates distances closer than 20 cm - note that FCC RF exposure limits at closer than 20 cm are in terms of SAR not field strength or power density. Please revise RF exposure exhibit accordingly.

Response:

2) The RF exposure exhibit in the test report indicates calculation distances closer than 20cm.   However in the same page of the report under Note: in the Specification, Maximum Permissible Exposure Limits it specifies that the "minimum separation distance is 20cm", see highlighted area below.

Specification
Maximum Permissible Exposure Limits

> Devices are subject to the radio frequency radiation exposure requirements specified in §1.1307 (b), 2.1091 and 2.1093 as appropriate. All equipment shall be considered to operate in a "general population/uncontrolled" environment.
>
> Limit S = 1mW / cm^2 from 1.310 Table 1
>
> Note: for mobile or fixed location transmitters the minimum separation distance is 20cm, even if calculations indicate the MPE distance to be less.

It is understood that this presentation may be subject to misinterpretation and therefore MiCOM Labs will amend how it reports the 20cm limit.

Question:

3) Submit an expanded plot of the Channel Closing Transmission Time. The scale should not exceed 600 ms. The purpose of this is to show that all data packets stop within 200 ms. The second requirement is that the control signals must not exceed 60ms total over the 10 second period after the radar signal ends. Your plot meets this requirement but I cannot distinguish between packets and control signals without the expanded plot.

Response:

The plot identifying the Channel Closing Transmission Time in Section 6.2.5 In-Service Monitoring etc. is only to be used as back-up information as this does not provide sufficient information.   The digitized data extracted from the plot identifying the exact on/off time during the Channel Closing Time is real time and precise.   Should control and data packets be required to be differentiated this

can be achieved through the data provided.   Not sure how control and data signals can be differentiated, if this is possible please advise.

The NTIA were satisfied with MiCOM Labs DFS test and reporting methodology and this has not changed.