

RE Change from 802.11 UNII to ISM.txt

From: LabHelp [LabHelp@fcc.gov]
Sent: Thursday, September 16, 2004 5:09 AM
To: david@waitt.us
Subject: RE: Change from 802.11 UNII to ISM

Question:

I have a client who has a IEEE802.11 A/B/G access point that is currently certified under part 15.247 for 802.11 B/G (2.4GHz) and 15.407 (UNII) for 802.11 A (5.15-5.25GHz, 5.25-5.35GHz and 5725-5.825GHz)

The client would like to now operate the upper band (5.725 - 5.825) as ISM under 15.247. In addition they would like to add the additional band of 5.825-5.85GHz to the ISM certification under 15.247.

I understand that operation between 5.825 - 5.85 GHz can be added with a Class II permissive change,

My question is can I change the rule part that the device is certified under for the entire 5.725-5.825 band to ISM (15.247) with the permissive change as well?

There will be NO HARDWARE changes to the accesspoint to accomplish this. The only change required is a software change.

Answer:

Since there is no hardware change, you can add the new frequency band to the filings so long as the change does not require a new authorization. A new authorization is required if the output power on the new frequencies exceed the original grant. Also, if operation on the new frequencies requires a new filing for RF safety reasons, then a new filing is required. For example, operation on the new frequencies proposes portable use when the original grant was mobile. Finally, the software change can only be done by the manufacturer prior to marketing. If the software change will be performed by the end user, then it is a Software Defined Radio(SDR) and a new filing as an SDR is required.