

Chris Harvey

From: Jennifer Sanchez [jsanchez@metlabs.com]
Sent: Wednesday, September 13, 2006 8:04 PM
To: Chris Harvey
Cc: Marie Confroy; Shawn McMillen; Tony Permsombut; Jennifer Sanchez
Subject: RE: Clarification needed for the SkyPilot application for Class II PC MT#20612

Hi Chris,

I have resolved the issues below and updated the network; please see my responses below in **RED**.

Please let me know if there are any other unresolved issues.

Thanks!
Jennifer

From: Chris Harvey [mailto:charvey@ieee.org]
Sent: Wednesday, September 13, 2006 12:45 PM
To: Jennifer Sanchez
Cc: Marie Confroy; Shawn McMillen; Tony Permsombut
Subject: RE: Clarification needed for the SkyPilot application for Class II PC MT#20612

Well, if the original device is not changing except that there is a new approved Pt. 90 module and associated digital circuitry, then only the digital portion is required to be tested and that report is for Verification and does not become part of this application.

The Class II Change for the SkyPilot FCC ID: [RV7-DBE1010](#) only needs to document the Collocation with the Pt. 90 device, which should include a description of the change, photos showing the details of the change, any technical information that has changed, a new label which reflects the fact that the Ubiquiti module is installed (This device contains FCC ID: SWX-SR4), new RF Exposure information for the collocation.

Since the Ubiquiti application has a no-collocation statement/condition on the grant, there may also need to be a Class II Change for the Ubiquiti (FCC policy should be followed per Shawn's verbal conversation with Joe Dichoso).

Does this help?

From: Jennifer Sanchez [mailto:jsanchez@metlabs.com]
Sent: Wednesday, September 13, 2006 2:11 PM
To: Chris Harvey
Cc: Marie Confroy; Shawn McMillen; Jennifer Sanchez; Tony Permsombut
Subject: RE: Clarification needed for the SkyPilot application for Class II PC MT#20612

Hi Chris,

Can you let me know how you think the report should be stated since the Transmitter portion is not collocated, but the digital portion is collocated?

I am working on the other issues with Shawn and the client. I will let you know once I have those resolved.

Jennifer

From: Chris Harvey [mailto:charvey@ieee.org]

9/14/2006

Sent: Wednesday, September 13, 2006 8:10 AM
To: Jennifer Sanchez
Cc: Marie Confroy; Shawn McMillen
Subject: Clarification needed for teh SkyPilot application for Class II PC MT#20612

Dear Jennifer, I am trying to understand the intent of this Class II Permissive Change application and finding it very difficult to do so with the exhibits submitted.

The Class II Permissive Change Cover letter has no details of the changes being made, just a generic statement that 'We are adding an additional radio to the unit'. The original Grant was for a 2412-2462 & 5745-5825 MHz (Dual-band) device with a no-collocation statement. The name of the device has now been changed to 'TriBand.'
Class II Permissive Change letter revised and saved in Customer Info folder as "Class II Permissive Change Letter-Sept13.pdf"

There seems to be an implication that a Ubiquiti 4.9 GHz radio module (possibly the FCC ID: SWX-SR4) is being added to this enclosure. The Ubiquiti radio also has a no-collocation statement. **Please refer to Shawn's email regarding this concern. Transmitter not co-located. Label updated with Ubiquiti FCC ID, see file "SkyExtender_TriBand_Label_REVISED1.pdf", Report updated to remove Co-Location statements, please see file "EMCS20612-FCC90.pdf"**

There are no statements about the ability or inability to simultaneously transmit on all 3 bands so I can not tell if this is an RF Exposure issue (the MPE exhibit only addresses the 4.9GHz radio). The Operational description indicates that this device contains a single 5GHz radio where the TriBand-Datasheet indicates that this operates in the 3 different bands. **Please refer to Shawn's email regarding this concern. No RF Exposure issue, Manual & Class II Letter has been updated to include statement regarding antennas being 36cm apart. Please refer to files "Class II Permissive Change Letter-Sept13.pdf" & "SkyExtender_TriBand_Installation_Guide.pdf"**

Please note that the FCC Rules indicate that all devices marketed under a single FCC ID number are to be identical. You can not add radio specifications to an existing grant using a class II when the hardware has changed. You can potentially include an already approved radio into an existing enclosure, maintaining the multiple FCC ID numbers on this upgraded device, as long as all compliance issues have been addressed.

If this applications intent is to add a collocation situation by adding a previously approved 4.9GHz radio module into a slot in this dual-band device, turning it into a tri-band device it would appear that the following would need to be done to obtain approval:

- 1) a Class II Permissive Change to the Dual-band radio for the collocation situation
- 2) a class II Permissive Change to the 4.9GHz radio to change the antenna (if applicable) and to add the specific host collocation.

Please update the Class II Permissive Change Cover Letter to better describe the situation for this (these) application(s).

Additionally, please clarify which Industry Canada RSS standard is being used to show compliance of this device with their regulations. **RSS-111 Issue 1, See IC Reference file, "EMC20612 IC Cross Reference.pdf" & "SkyPilot IC Test Report Cover Sheet.pdf" & "EMC20612 Draft IC CB Package 13 Sept 2006.doc"**

Best regards,

Chris Harvey