

To: Mr. Tim Johnson, American TCB

From: David Waitt

Subject: FCC ID RVW2230 compliance with FCC Part 15.407 (c),(d),(e),(g)

Date: 8 June 2004

This letter attests to the compliance of the access point radio to the above referenced FCC specification. If there are any questions or if additional information is required, please contact me at <a href="mailto:david@waitt.us">david@waitt.us</a>

On behalf of Nortel Networks

**David Waitt** 

15.407 (c) The device shall automatically discontinue transmission in case of either absence of information to transmit or operational failure. These provisions are not intended to preclude the transmission of control or signaling information or the use of repetitive codes used by certain digital technologies to complete frame or burst intervals. Applicants shall include in their application for equipment authorization a description of how this requirement is met.

Data transmission is always initiated by software, which is then pass down through the MAC, through the digital and analog baseband, and finally to the RF chip. Several special packets (ACKs, CTS, PSPoll, etc...) are initiated by the MAC. There are the only ways the digital baseband portion will turn on the RF transmitter, which it then turns off at the end of the packet. Therefore, the transmitter will be on only while one of the aforementioned packets are being transmitted.

In addition, the product incorporates a watchdog timer. If the radio were to "lock up" the timer would reboot the radio where it would come up in the receive mode.

15.407(d) Any U-NII device that operates in the 5.15-5.25 GHz band shall use a transmitting antenna that is an integral part of the device.

If an external antenna is used with the device, it will be permanently attached to the radio using a method approved by the FCC, thus meeting the "integral" antenna requirements. Once the external antenna is connected to the access point, it will not be able to be removed. Additionally, the external antenna will be professionally installed. In this case "Professional Installations may be performed by either an outside contracted IT company or the IT department (also approved / trained by the Grantee) responsible for the location where the wireless network is installed. The installer must have been instructed by the grantee and must be capable of making the "permanent" antenna connection.

15.407 (e) Within the 5.15-5.25 GHz band, U-NII devices will be restricted to indoor operations to reduce any potential for harmful interference to co-channel MSS operations.

The access point is not intended for outdoor use. The manual includes a statement stating that outdoor use is not allowed. Additionally, the enclosure of the access point is not weatherproof.

15.407(g) Manufacturers of U-NII devices are responsible for ensuring frequency stability such that an emission is maintained within the band of operation under all conditions of normal operation as specified in the users manual.

The transmit frequency of the access point has been monitored while the device has been temperature cycled over its specified operating temperature range. Concurrently, the supply voltage was varied throughout its specified operating range. In all cases, no portion of the transmitted signal ( within the 26 dB BW ) of the device drifted out of band.