



American TCB
6731 Whittier Avenue, Suite C110
McLean, VA. 22101

RE: C2PC for FCC ID: SK6-XR620

To whom it may concern:

The enclosed documents constitute a formal submittal and application for a Class II Permissive change / Reassessment for an indoor 802.11 access point pursuant to the following rules:

Subpart E of Part 15 of FCC Rules (CFR 47), UNII Devices

The purpose of this C2PC is to update the device to the FCC rules adopted under per Docket No. 13-49 for all 5GHz bands supported.

No changes were made to the operation in the UNII1 and UNII2a bands. The applicant is adding operation in the TDWR channels in the UNII2c band. As this now allows for a third 80MHz channel in this band, RF data has been provided in this application, to address the requirement of §15.31(m).

The applicant includes data to support the following changes to the product:

- 1) Updated DFS results (due to changes in the DFS requirements)
- 2) An attestation regarding the 5725-5850MHz band has been provided, per KDB 926956 D01 v01r05, Question 16(c)(4). The applicant is using the original filing 15.247 report to declare compliance with the 15.407 requirements as modified by MO&O FCC 16-24.
- 3) Addition of channels in the TWDW sub-band in the UNII2c band

All of these changes are made via software. No hardware changes were made.

National Technical Systems – Silicon Valley, as duly authorized agent prepared this submittal. A copy of the letter of our appointment as agent is included with the application.

If there are any questions or if further information is needed, please contact National Technical Systems – Silicon Valley for assistance.

Sincerely,

Mark Hill
Staff Engineer