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National Technical Systems – Silicon Valley TCB

May 3, 2016

RE: FCC ID: SK6-XR620

Attention: Gregory Czumak

Please find our responses to your comments on this application below:

Reference is made on p.8 of this c2pc DFS report to results obtained and submitted in the EUT's original DFS report, listed as Report Number R96167, however, the only DFS report on file with the FCC for this FCC ID is Report Number R96165 Rev1, which only appears to reference model XR630, not XR620 (the EUT). Please clarify.

RESPONSE: It appears that the original agent/lab did not upload the correct file. R96167 Rev 1 was provided to the applicant by NTS in November 2014. It is our understanding that this was provided to the TCB they used for their application. How should this situation be resolved?

Regarding the response to comment 3, the applicant and/or original agent/lab should contact the FCC Lab and request that the application be put into audit mode, so that the existing DFS report on file can be superseded by the correct version of the report (the one referenced in your response). Please inform us when that has been accomplished (it should be accomplished prior to our uploading the application and submitting the pre-Approval Guidance request).

RESPONSE: The applicant has started that process and we will let you know once the situation has been rectified.

Reference is made on p.8 of this c2pc DFS report to results obtained and submitted in the EUT's original DFS report (see previous comment), however, those tests (shown in Report Number R96165 Rev1) were performed in August 2014. Because the DFS test procedure (KDB905462)D02) has been revised 3 times since the time of testing, it is not clear that the results in the original report

remain applicable in demonstrating compliance with the current testing requirements. Please address each of the tests for which the results are being referenced from the original report and explain how the results remain applicable under the current test parameter requirements.

RESPONSE: This device was previous tested and approved against KDB 905462 D01. There were three significant changes made in the test procedure from D01 to D02:

1. Channel loading used during in-service monitoring
2. Bandwidth detection requirement changed from 80% to 100% of the OBW
3. Addition of Bin 1A and 1B radar types

Due to these changes, we felt that only the bandwidth detection and in-service monitoring tests needed to be performed. Based on our experience, the loading in the channel does not affect the channel close/move and non-occupancy. The CAC requirement was unchanged. When we reviewed the original NTS report, we saw that the device met the new bandwidth detection criteria.

A revised test report has been provided.