



Elliott Laboratories Inc.
www.elliottlabs.com

684 West Maude Avenue
Sunnyvale, CA 94085-3518

408-245-7800 Phone
408-245-3499 Fax

*Office of Engineering and Technology
Certification Division
Federal Communications Commission*

To whom it may concern:

The enclosed documents constitute a formal submittal and application for Class II Permissive Change Equipment Authorization for a wireless LAN device pursuant to the following rules:

Subpart E of Part 15 of FCC Rules (CFR 47)

The device was previously approved as a composite device under DTS and NII product codes to operate in the 5150 – 5250 MHz NII band and 2400 – 2483.5 MHz, 5725 – 5850 MHz DTS bands. The purpose of this Permissive Change is to add the 5250 – 5350 MHz and 5470 – 5725 MHz bands with the device classified as a master device.

Radiated emissions data is being submitted for the model XN-8 and XN-16 to cover the model XN-12. The XN-8 and XN-12 are depopulated versions of the XN-16. Preliminary testing on the XN8 and XN16 showed little difference in the spurious emissions and rf antenna port measurements between the full populated and the depopulated radios. The XN-16 contains four radios per rf board (a total of 16 radios) while the XN-8 contains only two radios per board (a total of 8 radios) and the XN12 contains three radios per board (a total of 12 radios).

A complete evaluation for DFS was performed on the XN-16 with spot checks on the XN-8 to verify that the detection threshold was not affected by depopulation of the rf boards. Also related to this C2PC application are C2PC applications for Xirrus models XN8 and XN16. These two devices use identical DFS firmware to the XN12. When requesting a sample for DFS evaluation please consider testing one of the series based on the results shown in the DFS test report.

Only the modified section of the User Manual (requiring a separation distance of 26cm rather than 25cm) has been uploaded as part of the application. Please advise if you wish to see the complete manual.

Elliott Laboratories, 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 Elliott Laboratories for assistance.

Sincerely,

Mark Briggs
Principal Engineer