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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-16. The XN-8 is a depopulated version of the XN-16. The XN-16 contains four radios per rf board (a total of 16 transceivers) while the XN-8 contains two radios per board (a total of 8 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 XN12 and XN86. These two devices use identical DFS firmware. 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**

MB/dmg