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RE: Xirrus, Inc.
FCC ID: SK6XS3900A

1) The last paragraph of the attestation letter cites 5180 MHz. Is this correct, or should this state 5150 MHz? Please correct/explain as necessary. It may also be helpful to define in this letter the maximum number of TX per band that the software will allow.

> The letter is trying to explain that in order to meet the band edge requirements when operating at 5180 MHz, the power for channel 36 is limited to 9.3dBm.
>
> The attestation has been updated and up loaded with revised wording to better explain the band edge issue and to include the maximum number of transmitters per band.

2) Internal photographs reference a Dual vs. Quad transceiver board. Please note that this application only covers the quad transceiver board. Any depopulation will require a separate FCC ID. Please confirm.

> A second application (for both FCC and IC approval) has been submitted to ATCB for the 8-port device containing the dual transceiver board.

3) Please provide information to show placement of labeling on the device.

> File *"Label location.pdf"* has been uploaded.

4) FYI…For PSD (2.4 GHz), VBW should be > RBW. However given margin shown, remeasurement will not be required. Please be careful in the future.

> Noted, thank you.

5) Recent interpretations clarify that the FCC will not accept a "double" delta method on the bandedge. This appears to be shown for 802.11(g) for 2.4 GHz. Please review/correct. (i.e. – may require retesting power and/or delta with RBW = 1 MHz, VBW = 10 Hz or reduction of power to meet requirements, etc.). Other bandedge appears to only uses single marker method which is acceptable. Please confirm.

> Plots showing the correct delta measurements have been inserted and the other plots removed. The higher gain external antenna (Patch antenna) will be rmoeved from the application. Please disregard the related information for the high gain, external patch antenna. The only external antenna will be the omni-directional antenna.

6) It does not appear that AC powerline emissions results were provided. Please review/provide as necessary.

These should have been with the test data for the 2.4 GHz operation. The revised data (see response to (5) above) includes the AC conducted emissions results.

7) Please explain -33 vs. -27 dBm on page 79 of test report. It would appear that all these would be either -27 or -33dBm. Please review/explain/correct.

The table has been updated to reflect -33dBm as the limit. Notes above the table clarified to explain that the limit in the plots is -27dBm but the limit used in the table is -33dBm.

8) Two sets of UNII data are provided. Please clarify and label as appropriate.

The two sets of radiated data are for external and internal antennas respectively. The start of each section has been modified to better identify the data sets..

9) The device contains 16 transmitters, but page 1 of the RF exposure appears to only cite 11 are used. Please explain as it is expected all 16 may function. Table 1 and/or page 1 in the RF exposure is confusing. What is the difference between the 2 rows? What is the table trying to show? Why is only 8 + 3 transmitters mentioned?

The calculation accounts for 16 transmitters – 3 in the 2.4 band, 4 in the 51550 – 5250 band, 4 in the 5250 – 5350 band and 5 in the 5725 – 5850 band. On of the rows was for the 8-port and the other for the 16-port version. I have removed the 8-port information from the 16-port MPE calculation and vice versa.

The modified document is *"MPE Calculation 16 port only.pdf"*

10) The users manual appears to suggest the incorrect band for indoor use. Please review/correct.

The user's manual has been updated and uploaded.

11) Please explain compliance to 15.407(c) & (g). Note that for frequency stability, IC requires +/- 10 ppm or testing per RSS-GEN 7.2.4.

Please refer to page 13 of the operational description which states a stability of 5ppm.

12) Page 31 of the manual mentions using all 16 TX's at once. Additionally the number of channels used appears to differ from other information in the application (i.e. 4 channels in 2.4 GHz band.). Please review/correct as necessary.

The user's manual has been updated to reflect actual operation and uploaded.

13) Page 98 of the manual shows 4 TX operating in 802.11 b/g, which does not match information elsewhere in the application.

The user's manual has been updated to reflect actual operation and uploaded.

14) IC only requests a reassessment of the device. Please explain/justify a reassessment by explaining if the schematics/block diagrams differ from the original device. I.E. How does the functional capability and radio circuitry differ from the original application.

The changes to the device are explained on page 11 of the test report. Block diagrams remain unchanged, although the schematics are different to account for the new balun in the transceivers and the modifications made to the main processor board (digital circuitry only). Functionally the device remains unchanged, with the following differences:

Output power will be slightly lower on channel 36 than on the previous version

Output power on the other channels in the lower 5GHz band can operate at higher levels than the previous version whenever there are less than 4 transceivers operational in that band.

15) Please provide new RSS-102 attestation (see ATCB's new form) for this device.

The form has been uploaded.

16) IC label must show model as certified. It does not appear that a model is shown on the label. Please correct.

The area immediately below the Xirrus trade name is a place holder for the model number. The label is shared between the XS3700-08 and the XS3900-16. A second label drawing showing the model number has been uploaded.

17) FYI….IC review will be finalized after FCC review has been completed.

Understood.