The attached documents provide the paper trail for the KDB enquiry submitted to support the alternate DFS test mode for the module.

The attachments are:

- The original enquiry
- The FCC's response accepting the proposed DFS test method
- The attachment to the original enquiry outlining the proposed test method



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Draft Laboratory Division Publications (Expired)	Date of Submission:	02/03/2010	
Draft Publication Moderation Policy	Subject:	Proposal for Alternate DFS testing	
Related Sites Equipment Authorization Presentations	Question:	I have an 802.11a client device, operating in the DFS bar applicant is a module that will be used on Windows Mob platforms. Windows Mobile/CE does not allow for the st of the DFS video file. See attached proposal for an alter	nds. The bile/CE reaming rnate test
Equipment Authorization System (EAS) Telecommunications Certification Bodies (TCB)		method. This is the same method that the FCC approve KDBs 536826 and 654745 for the same applicant. This i radio module for the same market space.	ed under s a new

Please send any comments or suggestions for this site to OET Systems Support

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From: oetech@fccsun27w.fcc.gov Sent: Wednesday, March 10, 2010 12:01 PM To: Mark Hill

Subject: Response to Inquiry to FCC (Tracking Number 827472)



Inquiry:

----Reply from Customer on 03/01/2010---

Has there been any comments from NTIA regarding this KDB? We are just about ready to finalize testing and submit to a TCB. Thanks.

Response:

The FCC approves this DFS alternative streaming technique based on the previous NTIA approvals for KDB 536826 and KDB 654745. Please include the attached file in the application and also include this approval KDB as an exhibit to show that it has been approved.

Do not reply to this message. Please select the <u>Reply to an Inquiry Response</u> link from the OET Inquiry System to add any additional information pertaining to this inquiry.

Proposal for Alternate DFS Test Procedure for Summit Data Communications, Model SDC-MSD30AG, FCC ID: TWG-SDCMSD30AG

Product Description:

The Summit Data Communications, model SDC-MSD30AG, is an 802.11abg radio module. Its primary market space is targeted at industrial inventory control systems.

The module would be installed in Windows CE based handheld device. The module has a 16bit interface which limits the data rate between the host device and the radio, as compared to 32bit cards.

The module supports operation in the DFS bands of 5250-5350 MHz and 5470-5725 MHz bands and is a client device without radar detection.

The Windows CE will not support the playing the movie file specified in FCC 06-96. There is no driver for the module for use in a typical Windows computer, therefore streaming the movie file is not possible.

Proposed Alternate Method:

The Windows CE will not support the playing the movie file specified in FCC 06-96. There is no driver for the module for use in a typical Windows computer; therefore streaming the movie file is not possible.

Instead, we propose performing the DFS testing while the system is performing a FTP file transfer of the DFS movie file. The data rates will be adjusted to allow for the highest channel loading allowed by the system, up to a maximum loading of 20%. The 20% is based on the expected channel loading of a typical 802.11a radio link streaming the movie file.

General Test Setup Procedure:

- Connect FCC approved Master AP (Cisco Aironet 1250AG, FCC ID: LDK102061) to a network, via wired Ethernet, that allows connection to FTP server.
- 2) Install Summit radio module on an extender card into the HP iPaq.
- 3) Connect the lowest gain antenna to the "5G Main" antenna port on the EUT.
- 4) Using the Summit SCU application, associate the EUT with the Master AP
- 5) Launch the FTP application on the iPaq

- 6) Connect to the FTP server application to the FTP server hosting the movie file
- 7) Initiate a FTP download of the movie file from the host
- 8) Monitor the channel loading during transfer
- 9) If the channel loading is less than 20%, stop the file transfer and clear the cache on the iPaq.
- 10) Reduce the maximum allowed data rate for the Master AP, using the AP's GUI interface.
- 11) Repeat steps 4 thru 9 till the channel loading is as close to 20% as possible.
- 12) Record the data rate setting on the Master AP and the channel loading.
- 13) While the system is performing a FTP transfer using the settings from item 11 above, perform the Channel Closing Transmission Time and Channel Move Time measurements as required by FCC 06-96 using a radiated test.

Results:

Testing showed that the maximum channel loading achievable by the system was 14.9%, see Figure 1 below. This was achieved by setting the Master AP to the lowest allowed data rate for 802.11a, 6Mb/s.

DFS testing to be performed using these conditions.



Figure 1 - Channel Loading at 6 MB/s

Results from the DFS testing will be reported in the final DFS report submitted as part of the application.

Conclusion:

The HP iPaq system is typical of the end-use host systems for the Summit 802.11 Compact Flash radio module, FCC ID: TWG-SDCMSD30AG. The maximum channel loading achieve was 14.9% using the lowest data rate setting for 802.11a.

This represents the worst case situation in a real world application for DFS testing; as the EUT is not designed for operation in systems that would allow for (a) greater data transfer over the digital interface to the host system, and (b) the operating system of the end-use host devices do not support streaming video.