6) A separate description/attestations should be provided by the applicant explaining how the device meets KDB 443999. Are any configurations expected for outdoor use? Note that as of 9/20/11 in FCC to TCB discussions - FCC is looking for greater and clear justification for indoor use only. They are looking for more info beyond just the typical manual statement of indoor use only. Additionally, an appropriate attestation for KDB 443999 for the following has not been provided for:
"...appropriate attestations that the device has no option to change the DFS parameters" and "...and it is prohibited to include configuration controls (e.g. country code settings or other options to modify DFS functions) to change the frequency of operations ..."
$\rightarrow$ Please kindly check Motorola Antenna Installation Guide we submit to your site today. (Refer to page 17 which is related to KDB44399) and the configuration area of the Access Point is password protected, before the device can be used it must be configured for operation. The first step required in the process is to create a new password to limit access to the configuration area.
7) A separate description/attestations should be provided by the applicant explaining how the device meets KDB 594280 .
$\rightarrow$ Ans: Please kindly check Motorola Antenna Installation Guide we submit to your site
8) A statement confirming TPC compliance does not appear to be provided (explanation as part of operational description or similar).
$\rightarrow$ Please refer to the "FCC Request and Declaration Letter" which was submitted in Original Equipment certification process. State No. 3 states it supports TPC function.

Info mentioned on the next page

## Regulatory Engineering

## 3. TPC Declaration:

We, the undersigned, attest that this device does support "TPC" Transmit Power Control in the 5 GHz UNII bands.

The software and associated drivers to support TPC are built into the device firmware, with no mechanism to disable or turn off TPC.
4. Restricted Access to software and controls to set the Frequency and or disable DFS Declaration

We, the undersigned, attest that this device does not support access, by any party (End User or Professional Installer), to set the frequency or disable DFS. A US specific version of this product will be sold for use in the US. This US version will only support US frequencies listed on the FCC Grant, the "Country Selection List" for this unit only has US listed.

There are no controls or selections in the product firmware that can turn off/disable DFS

## 5. Module Declaration

We, the undersigned, attest that this device is compliant to all the requirements for a Modular Approval. Not all of the AP-6 Radio module functionality will be enabled, there are no controls or settings for the End User to enable operating bands.
6. Declaration of Part 15 Subpart B Compliance

We Motorola Inc., as the grantee of this device would like to declare that the composite portion categorized as computer peripheral has been authorized under the Declaration of Conformity procedures.

## 7. 5.60-5.65 GHz Restricted band Declaration

We, the undersigned, attest that this device does not support operation in the $5.60-5.65 \mathrm{GHz}$ band. The firmware on the device restricts the operation in this frequency band and does not utilize the channels in this band.

Respectfully,


Mark S. Luksich
DMTS, Regulatory Engineering
631-738-5134
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9)

It appears DFS was tested radiated. First radiated retesting is needed for external antennas when a lower gain antenna is used. It does not appear lowest gain external antennas were tested.
$\Rightarrow$ The lowest Antenna gain, ML-2452-APA2GA1-01 was used for DFS test as shown in DFS report.

| Type | Model Number | 5 GHz |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Peak Gain | Cable Loss (external) | Cable Loss (internal) | Net Peak Gain | Note |
| Dipole | ML-2452-APA2-01 | 5 | 0 | 1.5 | 3.5 | Antenna 1 |
|  | ML-2452-HPA5-036 | 4.9 | 1.1 | 1.5 | 2.3 |  |
|  | ML-5299-APA1-01R | 2 | 0 | 1.5 | 0.5 |  |
|  | ML-5299-HPA1-01R | 5 | 0.84 | 1.5 | 2.66 |  |
|  | ML-2499-HPA3-01R | N/A |  |  |  |  |
|  | ML-2499-APA2-01R | N/A |  |  |  |  |
|  | ML-2452-APA2GA1-01 | 1 | 0 | 1.5 | -0.5 |  |
| Panel | ML-2452-PNA5-01R | 5.00 | 0.60 | 1.5 | 2.9 | Antenna 2 |
| Patch | ML-2452-PTA3M3-036 | 3 | 0 | 1.5 | 1.5 | Antenna 3 |
|  | ML-5299-PTA1-0R | 5 | 2 | 1.5 | 1.5 |  |
|  | ML-2499-SD3-01R | N/A |  |  |  |  |
| PIFA_NCAP | NCAP PIFA | 6 | 0 | 0 | 6 | Antenna 4 |

Note: Due to antenna ML-2452-APA2GA1-01 is the lowest gain antenna, it was selected to execute DFS test.

