Federal Communication Commission

RE: FCC Class II Permissive Change for Avaya, FCC ID: X7CAP8120, IC ID: 3794G-AP8120

To whom it may concern:

The enclosed documents constitute a formal submittal and application for a IC Reassessment for an 802.11abgn access point to the following rules:

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

The device was originally certified for operation in the DTS and all NII bands, as a master device, using an integral antenna. This permissive change/reassessment is to address changes to the product to support removing the integral antenna and using it externally and the addition of a new, higher gain, panel antenna.

Due to the higher gain of the panel antenna, power has had to be reduced for this configuration from the original certified device.

In addition, testing was performed on the external antenna configuration to address the enabling of a new mode of MIMO operation, STBC.

For the external antenna configuration:

- STBC 20 MHz and 40MHz operation was enabled in the 5250-5350 MHz band

STBC operation is not enabled for the internal antenna configuration.

This C2PC is limited for the NII approval to the DFS band, 5250-5350MHz and 5470-5725 MHz. A previous C2PC was filed and approved, via a TCB, to address the same changes for the non-DFS bands.

Changes to the product include the removal of the external plastic cover that enclosed the AP and the integral antenna and the mounting of 6 reverse SMA connectors on the side of the metal enclosure.

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 Hill
Staff Engineer

MEH/dmg