

In review of the procedure some comments came to mind:

Section	Comment
III	Clarification on data rates / modes of operation should be added, especially regarding progression of tests. Is it sufficient that manufacturer states the worst case power output mode and operating configuration? If measurement data is required, what data constitutes sufficient information to determine worst case? Is power output data sufficient for this purpose? Or, should all conducted tests be performed for all modulations/ data rates for all tests, including conducted spurious emissions? For some equipment the worst case mode/datarate/modulation may differ across the measured transmit channels, especially for proprietary (non-established) transmitters. Would the commission please offer guidance for this aspect?
V A, EBW1	For EBW1 procedure: please clarify acceptable range of allowed bandwidths. Setting a target range such a RBW between 1 to 5% of the EBW would provide more clarity to the procedure and align with ANSI C63.10 section 6.9 and ANSI C63.4 section 13.7. Please state whether the required minimum bandwidths from ANSI C63.4:2009 section 13.7 should be ignored or followed (eg, for measurements>1GHz, a minimum 100kHz RBW is required).
V A, EBW2	For EBW2 procedure: please clarify what should be the RBW and VBW settings for this measurement. Should same procedure for EBW1 be followed (eg, 1-5% RBW with VBW=3xRBW), or should RBW be set to Auto-coupled?
VB, PK2	For band power measurement PK2 procedure: Please ensure care is taken with this measurement because some equipment manufacturers automatically change detector mode to average when band power measurement function is enabled. The detector mode must be changed to peak when this function is employed for the purpose of peak power measurements.
V D, BWCF	In order to eliminate ambiguity, in addition to showing the calculation for BWCF, please show the value expected: -15.2dB
V E, General	<p>For section E, in paragraphs describing the reference measurement, the term “peak” is used at the end of both paragraphs which may cause an interpretation problem. I suggest revising both paragraphs as follows:</p> <p style="padding-left: 40px;">If the peak output power procedure is used for fundamental emission to demonstrate compliance to <b>15.247(b)(3)</b> requirements, then the peak conducted output power measured within any 100 kHz outside the authorized frequency band shall be attenuated by at least 20 dB relative to the maximum measured in-band peak PSD level.</p> <p style="padding-left: 40px;">If the average output power procedure is used for fundamental emission to demonstrate compliance to <b>15.247(b)(3)</b> requirements, then the average conducted output power measured within any 100 kHz outside the authorized frequency band shall be attenuated by at least 30 dB relative to the maximum measured in-band average PSD level.</p>
V E, OOB	In section E, the term OOB is used without being defined. I believe it was meant to be “Out of Band Emissions.”
V E, Cond proc, 15.205	In the section on unwanted emissions in restricted bands: The operating mode for the transmitter is not defined for <1GHz measurements, unlike the >1GHz procedure. Does that imply that the equipment can be operating in two different modes depending on the frequency range of measurement? Referenced clause: “The average emission levels shall be measured with the DUT transmitting continuously (≥ 98% duty cycle) at its worst-case power level.”
V E, Cond proc, 15.205	Regarding radiated emissions for enclosure port test with the antenna terminated, are tests required for all modes or just the worst case operating mode? Is the test required to be performed a each of the frequencies in accordance with 15.31(m)? Or may the test be performed at one frequency representing the worst case overall power output?

V E, Cond proc, 15.205	Choice of antennas for assessment of test data is not adequately addressed: If the manufacturer assumes a 6dBi antenna, can the equipment be used with any antenna up to 6dBi gain? Should the manufacturer choose the highest gain antenna to be employed for the purposes of demonstrating compliance with this part (assuming of course that the chosen antenna gain also meets 15.247(b) and (c) requirements for maximum EIRP)? Thus may any antenna be employed having antenna gain less than the chosen value? Should there be a statement or grant note requirement for declaring the maximum antenna gain to be used with transmitters satisfying 15.247 requirements employing the revised method of measurement?
V E, BE	In the section regarding band edge measurements, the procedure seems to address only band edge measurements near restricted bands >1GHz. Near other band edges, the requirement for emissions would be that of 15.247(d) where 100kHz emissions bandwidth is required. Recognizing that this procedure is in the section pertaining only to the 15.205 restricted bands, should there also be a corresponding section in the measurement procedures for other conducted or radiated measurements?
N/A	How will certification of transmit antennas be affected by this procedure? Traditionally, the FCC has required updated certification filing (PCII) for adding an equipment antenna type or higher gain with at least one purpose to demonstrate compliance with that antenna in a restricted band. With the proposed changes to the restricted band measurements, how will the certification procedures be affected by equipment where the new method is employed?