

Comment 1:

It appears that the FCC is restricting 802.11ac devices more so than other UNII systems, based on the total aggregate power restriction when operating in multiple sub-bands.

For example, a device that is comprised of two separate UNII radios would be allowed to transmit in each sub-band at the maximum power limit specified for the sub-band. If operating at 5200 MHz and 5500 MHz for example with a 26dB BW greater than 20MHz and antennas less than 6dBi, the 5200 MHz emission from radio 1 would be limited to 50mW and the 5500 MHz emission from radio 2 would be limited to 250mW.

Per the 644545 guidance, if the emissions were from an 802.11ac system, the total power would be limited to 250mW.

This is inconsistent. Please explain why there would be a different limitation.

Comment 2:

It appears that this procedure is superseding the requirement in 15.215(c). The FCC has previously referenced this requirement for showing proof with the 5600-5650 MHz band exclusion and for devices limited to 5150-5250 MHz.

Comment 3:

644545 guidance document shows channels that fall within the 5600-5650 MHz restricted sub-band. Please include additional comments that explain if these channels are now available for use for an 802.11ac system or if they are still restricted (per KDB 443999). Note, if still restricted, then the 160MHz BW channel is not usable. Because the channel plan shown in Figure 1 has channels that would not meet the 443999 restriction, explicit statements should be made.

Comment 4:

Band crossing emissions – does the procedure for measuring power for emissions that cross a boundary between two sub-bands apply to other devices that are not 802.11ac, proprietary systems? If so, please update KDB 789033.

Comment 5:

Page 10- Fix the typo in the first sentence of G) 2).

Comment 6:

Are there going to be any changes to the DFS test procedure (FCC 06-96)? In particular, to address testing for 80 and 160MHz channels bandwidths and for 80+80 operating conditions?

Performing the bandwidth detection test using 1MHz steps, 10 trials per step, for 80 MHz operation will take a significant amount of time. Are there ways that this can be streamlined?

For 80+80 systems with radar detection, I assume that in-service monitoring tests will have to be applied to each 80MHz segment for all radar types, minimum of 30 trials per radar per segment. The percentage detected for a particular radar type would be calculated based on the total trials applied to both segments.