Joe.

Thanks for consolidating these various KDBs. It is clear that a lot of work went into this. It will also be extremely beneficial to improve accuracy, repeatability and consistency. I have the following suggestions for clarification.

Mike Heckrotte

Compliance Certification Services

P22. Duty Cycle formulas are unclear: "whichever is less" is ambiguous therefore could refer to either the entire formula (= duty cycle) or just the denominator (=100 ms or Period), but these two interpretations will yield opposite results. Suggest:

(Fourth bullet item)

Duty cycle = on time/100 milliseconds or Duty cycle = on time/Period, whichever calculation yields the greater duty cycle

(Eighth bullet item)

Duty Cycle = (NL...NL)/100 where L is in msec, or (NL...NL)/T where L and T are the same units, whichever calculation yields the greater duty cycle.

p. 26 Typo: change "Measurments" to "Measurements". Text runs into bottom footer, making it difficult to read

p. 33 Name of first procedure is misleading, some clarification is warranted. Second procedure ought to be fully specified.

Suggest:

Change "Channel Bandwidth" to "Channel power integration over emission bandwidth" Change 1) to:

"Set RBW at least 1 MHz and VBW greater than or equal to RBW"

For BW correction factor procedure, full description of procedure is:

- 1) Use EBW = as appropriate for the power measurement. (e.g. 6 dB, 20 dB or 26 dB bandwidth).
- 2) Set RBW at least 1 MHz and VBW greater than or equal to RBW.
- 3) Set analyzer span > EBW.
- 4) Set sweep time to automatic.
- 5) Use peak detector on max hold.
- 6) Peak Power = 10 log (EBW / RBW) * (highest amplitude on analyzer trace).
- p. 78 Text runs into bottom footer

- p. 109 Change "marekting" to "marketing"
- p. 113 Text at bottom is cut off but appears to duplicate most of the slide
- p. 163 Text runs into bottom footer
- p. 165 Text runs into bottom footer
- p. 184 Requires Clarification

(First Bullet Item)

Need to specify minimum sweep time in addition to maximum, or else specify exact sweep time. For example, with current procedure someone could use sweep time = 201 msec, but this would not show closing time characteristics between 201 and 600 msec. It does not matter what transmissions occur in the first 200 msec since any transmissions are allowed. The requirement is that only intermittent control signals are transmitted after 200 msec, and the purpose of this test is to verify that no data signals are transmitted after 200 msec, therefore the observation period starting at 200 msec after the radar burst is the critical time period to show on the trace for this test.

(Second Bullet Item)

Change "Bin 1 through 5" to "Bin 1"

(Note: If the intent is to perform the Move Time test with Bins 1-4, then additional clarification regarding the Bin type(s) to use for Closing Time and Aggregate Transmission Time is needed)

Change "Bin 6 (Long Pulse)" to "Bin 5 (Long Pulse)"

(Note: If the intent is to perform the Move Time test with Bin 6, then a sweep time of approximately 310 msec will be required to observe both the radar waveform and the move / closing time observation period. Additional clarification regarding the Bin type(s) to use for Closing Time and Aggregate Transmission Time is needed)

(Third Bullet Item)

Change "Aggregate Transmission Time (Non-occupancy)" to "Aggregate Transmission Time"

Question regarding:

• Not required for client devices

(Please clarify if client devices are not required to meet all of the Channel Closing Transmission Time requirements specified by Tables 2 and 4 of FCC 06-96. If so, please

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clarify whether this requirement rescinded for both Clients with radar detection and Clients without radar detection.)

p. 187 Conflicts with published requirements
(First Sub Bullet Item under Second Main Bullet Item)
No, but the DFS detection threshold must be verified
(Recommend the Radar Detection BW test)
According to Tables 1 and 2 of FCC 06-96, DFS detection threshold is not applicable to client without detection capability

p. 204 "Note: Repeat move time for bins 2 to 5" Same inquiry as regards to Second Bullet Item of p. 184.

p. 205 "Sweep time = 250 msec" Same comments as regards to First Bullet Item of p. 184.

p. 206 Sweep time = 6 sec is inadequate for non-occupancy period

p. 207 plot shows no bins above threshold, therefore non-zero aggregate time is not consistent with the plot