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ACB

April 5, 2019

RE: FCC ID: Q9DAPIN0534535

IC: 4675A-APIN0434535

Attention: Greg Czumak

Please find our responses to your comments on this application below:

Since the EUT can be connected to a pc, it is also considered a pc peripheral, subject to either SDoC or certification. Please indicate which option will be employed to authorize the digital device portion of the EUT. If certification is chosen, please note that a separate Part 15B test report will be required, and there will be an additional fee. If SDoC is chosen, please note that the information to the user required by Section 2.1077 must be included in the User's Manual prior to marketing the EUT in the U.S.

Response: The EUT will not directly connect to a PC, except for possible setup/configuration. The USB port is used for image uploading via a flash drive. The microUSB is used for configuration/setup only. In any case, the SDoC procedure will be used for unintentional radiator portion of the device. The information required by 2.1077 can be found in the Start-Up Guide (provided with the product) and the Installation Guide (available online).

For the 5.15 – 5.25 GHz band, the 5 GHz WiFi (NII) test report lists FCC output power, psd, etc., levels that are significantly higher than the corresponding ISSED levels presented in the report. While the application demonstrates how compliance with FCC requirements are achieved, it is not clear how the appropriate compliance of devices intended for use in Canada is assured. What prevents a device configured for operation in the U.S. from being operated in Canada at levels that exceed ISSED limits for operation in this band? How is compliant Canadian operation guaranteed? Please clarify.

Response: Aruba restricts US devices to sale within the US and US territories. Devices sold in Canada do not have access to US operation conditions. This is restricted via locked country codes in the APs and associated controllers.

The application indicates that the external antenna connectors on the model 534 are RP-SMA. Please confirm that RP connectors are also used between the cable and the antenna(s) as well. If they are not, then, (i) a letter justifying the use of standard connectors must be submitted, addressing the EUT's intended usage, installation requirements, and method of marketing, all showing the need for professional installation; and (ii) the connectors on the EUT do not need to be RP.

Response: The supported antennas are either directly connected to the AP at the RP-SMA connectors or come with their feed cables that are also fitted with RP-SMA connectors.

It does not appear that the report includes the measured 6 dB BW values for the emissions in the 5725 – 5850 MHz band, as required to demonstrate compliance with RSS-247(6.2.4.1). Please revise to also include this data.

Response: The plots of the bandwidth of the device in the report clearly demonstrate compliance with the minimum 6 dB BW requirement. It was not considered necessary to specifically provide actual values for this requirement.