

National Technical Systems – Silicon Valley TCB

May 2, 2016

RE: FCC ID: SK6-XR2425H

Attention: Gregory Czumak

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

1. Reference is made in this c2pc DFS report to results obtained and submitted in the EUT's original DFS report, however, those tests were performed in October 2013. Because the DFS test procedure (KDB905462)D02) has been revised 3 times since the time of testing, it is not clear that the results in the original report remain applicable in demonstrating compliance with the current testing requirements. Please address each of the tests for which the results are being referenced from the original report and explain how the results remain applicable under the current test parameter requirements.

Response: This device was previously tested and approved against KDB 905462 D01. There were three significant changes made in the test procedure from D01 to D02:

1. Channel loading used during in-service monitoring
2. Bandwidth detection requirement changed from 80% to 100% of the OBW
3. Addition of Bin 1A and 1B radar types
4. Clarification of radar frequencies used during in-service monitoring

Due to these changes, we felt that only the bandwidth detection and in-service monitoring tests needed to be performed. Based on our experience, the loading in the channel does not affect the channel close/move and non-occupancy. The CAC requirement was unchanged. When we reviewed the original NTS report, we saw that the device met the new bandwidth detection criteria.

2. The DFS report states, on p.7 under “Deviations From The Standard”, that only the In- Service Monitoring testing was performed for this c2pc report, and that the BW Detection, Channel Close/Move, CAC and Non- Occupancy results were provided in the EUT’s original DFS report (see previous comment). However, the c2pc DFS report appears to include BW Detection data, but not Channel Close/Move or Non- Occupancy data, while KDB905462)D02)7.8.3) lists both Channel Close/Move and Non- Occupancy as In- Service Monitoring tests. Please clarify precisely which tests from KDB905462)D02) were performed in this c2pc report, which tests were performed in the original report, and why.

Response: The DFS report has been updated to clarify the testing performed by NTS.

3. The Attestation Letter lists the minimum and maximum antenna gains used by the EUT as 5 dBi and 14 dBi, however, the DFS report (p.10) lists them as 1.7 dBi and 12.1 dBi. Please reconcile

Response: The DFS report has been updated. The 1.7dBi was incorrectly stated and the 12.1dBi was intended to identify the 14dBi antenna with additional RF cable with 2.9dBi of loss in the DFS bands.

Regards,



Mark Hill
Staff Engineer

Uploaded Exhibits:
DFS Test Report