

General:

The Government - Industry (ITAC-R) group has worked very closely to develop the test procedures for DFS to be applied to devices operating in the 5250 MHz to 5350 MHz and 5470 MHz to 5725 MHz (NII) bands. As a part of the agreement the several US Government agencies required that the FCC closely monitor the implementation and certification of devices which are subject to the new requirements. It was agreed that the FCC Laboratory will evaluate and test all the devices which incorporate "radar detection functions" prior to issuing a grant of certification. Thus any device (either operating as master or client) which has a radar detection function, must be tested for compliance by the FCC.

The current procedure for applications to the FCC will be similar to all the others where "pre-grant" testing is required. Thus, the FCC must receive a completed application with all the exhibits properly uploaded. Once the exhibits including test reports are reviewed for completeness, the FCC will request samples for testing. The processing of applications will be done on a "first-come first-served" basis. A grant of certification will only be issued once the sample testing is finished by the FCC. If the submitted application has either used procedures with variations or included characteristics which were not initially considered, the review may require further consultation with other US Government agencies. This may result in additional processing time.

The same review procedure will apply for new applications or permissive changes which require addition of the function. The proposed procedure applies to all devices which incorporate radar detection functions which control dynamic frequency selection operation. This would typically cover all access points which act as masters, as well as any clients which may occasionally operate as masters or modules which may be programmed to operate in either modes. Further any client devices which enable "ad-hoc" or "peer to peer" modes also must have radar detection functions or else disable the "ad hoc" or "peer to peer" modes in the appropriate bands.

TCBs can approve devices without radar detection functions, unless the submission to the FCC is necessary for other reasons (for example, evaluation of RF Exposure data for above 3 GHz operation). The devices approved by the TCBs must clearly demonstrate that they perform channel move procedures as required by the rules. The test report must clearly include the FCC ID of the master device with which the tests were performed. Thus, the TCBs must not approve devices without radar detection functions until the specific master device that it was tested with is approved. In addition, as noted above, any "ad hoc" or "peer to peer" operations must be evaluated. While no specific test procedures are recommended, the applicant must provide a clear attestation to meeting this requirement. The User manual and /or operations manual should be reviewed for this purpose. For applications submitted to the FCC only as a result of RF exposure evaluation requirement, there will not be any requests for "pre-grant" sample testing. The current procedures continue to apply.

The FCC and US Government recognize that the proposed procedures will create challenges for everyone and we plan to move expeditiously in processing all the applications. We cannot commit to any specific timeline. Currently, the FCC has been processing 90% of applications in less than 50 days. This assumes that the application has no major issues. We are encouraging all the potential applicants to start the process as soon as possible.

Specific responses:

a) Will FCC review & grant cert for DFS C2PC submissions first, then ask for audit samples for DFS testing in the lab? Or will you ask for audit sample and do testing as part of the review (and Not issue Grant until after audit testing is finished to your satisfaction)?

As discussed before, the FCC will review, conduct tests and then issue a grant. The sample testing is part of the review and grants will only be issued after the testing is completed.

b) Will answer be any different for APs vs. Client devices?

There is no difference between devices having radar detection functionality. If the client device does not have radar detection functions, a pre grant sample will not be requested. The current application review guidelines will continue to apply.

c) Will FCC have a committed or target turnaround time to keep within for the audit testing done at your lab?

At the present time there is no plan for a fixed turnaround time.

I hope that this clarifies our present plans.

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