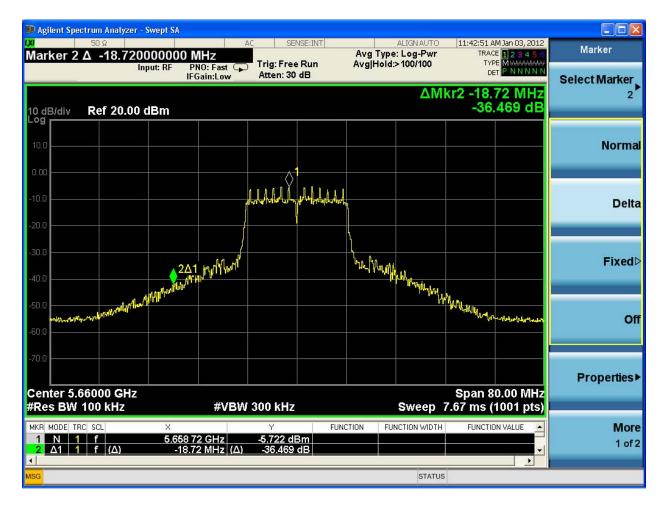
- Does this device meet the requirements for operation in the 5400 5725 MHz band specified in KDB 443999? Yes, Section 3.2 of the user manual lists the available channels and states, "This device will not operate in 5600 MHz - 5650 MHz band". Furthermore, this is a client device with no radar detection and no ad-hoc capability. It meets the 15.202 definition of a client device.
- 2. Is this an indoor device, outdoor device, or multi-use device? A multi-use device can operate in both indoor and outdoor configurations; such device will have to meet all the requirements for outdoor device. Per the grant notes, operation in the 5150 5250 MHz band is restricted to indoor use only. Therefore outdoor use outside of that band is not restricted. As a client device with no radar detection capability, it meets the requirements for outdoor use per KDB 443999.

3. Verify that the 5600 – 5650 MHz band is notched. The test report should include 20 dB BW plots for the 5600 and 5650 MHz band edges and an attestation statement that the device does not transmit in the notched band. See measurements below



## **Band edge Compliance for 5580 MHz**

Value	Limit	Result
-35.6dBc	≤ -20dBc	Pass



## **Band edge Compliance for 5660 MHz**

Value	Limit	Result
-36.4dBc	≤ -20dBc	Pass

4. Verify that this application contains a complete User's Manual and/or Professional Installers Manual. If the manual is not complete, upload an updated User's Manual exhibit. The User Manual that was uploaded with the filing is complete.

- 5. Verify that this device meets the uniform channel spreading requirements on the remaining (non-notched) channels once the device is in operation. The device meets the 15.202 definition of a client device. Channel spreading is determined by the master device.
- 6. Explain how this device meets the Software Configuration Control requirements of KDB 594280 including country code selection see draft KDB at (<a href="https://fjallfoss.fcc.gov/eas/comments/GetPublishedDocument.html?id=205&tn=511416">https://fjallfoss.fcc.gov/eas/comments/GetPublishedDocument.html?id=205&tn=511416</a>). If there is any user permitted configuration control, please explain what controls are provided to the user and if any will take the device out of compliance; also explain what prevents the end user from downloading and operating non-US software.

UA9400 meets the software configuration control requirements of KDB 594280 including the country code selection as per the below information.

- No user configuration controls are provided to a third party that modifies the operating parameters of frequency range, modulation type or maximum transmit power.
- The software is not designed or expected to be modified by any party including the manufacturer. Only the grantee can modify the software. No user accessible software will be made available.
- The software that controls the radio and the processor functionality are independent. Software updates are sent only to update the processor functionality. Hence the software updates will not include anything that will manipulate with the radio functionality.
- Country code selection is not included in this device (UA9400) since it is a client device. Country code selection is included only in a master device.
- 7. Additional questions for outdoor and multi-use devices: Submit a Letter Exhibit identify the specific expertise and the training required by the professional installers for installing these types of devices. As specified by the grant notes and applicant cover letter, this module is for OEM installation only. It is not professionally installed.
- 8. Explain how this device can meet the 30 MHz frequency separation from TDWR (i.e.: Manually blocking frequencies by the professional installer, device notches 5470 -5680 MHz, etc.) The device meets the 15.202 definition of a client device. It has no radar detection or ad-hoc capability. The TDWR requirement is for devices with radar detection capability such as master devices. KDB 443999 specifies that the TDWR requirement is only for master devices with radar detection and with DFS capability. It states, "In the interim, the Commission will now allow certification of wireless master devices with radar detection function and with DFS capability, if they meet the following conditions:"

9. Does the manual for the installers and operators contain the information on how to register the device with the voluntary industry data base if operating within 35 km of any TDWR site location? The device meets the 15.202 definition of a client device. It has no radar detection or ad-hoc capability. The TDWR requirement is for devices with radar detection capability such as master devices. KDB 443999 specifies that the TDWR requirement is only for master devices with radar detection ans with DFS capability. It states, "In the interim, the Commission will now allow certification of wireless master devices with radar detection function and with DFS capability, if they meet the following conditions:"