



TELECOMMUNICATIONS
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By Electronic Delivery via <https://apps.fcc.gov/oetcf/kdb/index.cfm>

May 23, 2014

Attn: Dr. Rashmi Doshi
Chief, Laboratory Division
Office of Engineering and Technology
Federal Communications Commission
7435 Oakland Mills Rd.
Columbia, MD 21046

Re: *Comments of the Telecommunications Industry Association on Draft Knowledge Database Publication 905462 (Compliance measurement procedures for U-NII with DFS)*

Dear Dr. Doshi:

The Telecommunications Industry Association¹ ("TIA") hereby submits input to the Federal Communications Commission's ("FCC") Office of Engineering and Technology on draft Laboratory Division ("OET Labs") on its draft Knowledge Database ("KDB") Publication 905462, titled *Compliance measurement procedures for U-NII with DFS* ("Draft KDB 905462").² TIA appreciates the efforts of the FCC Labs to provide key guidance on important topics under the FCC's new rules in the 5 GHz band.

¹ TIA is a trade association based in the Washington, DC area which represents the global information and communications technology ("ICT") manufacturer, vendor, and supplier community through policy advocacy and standards development. TIA is also accredited by the American National Standards Institute (ANSI) as a standards developer for the telecommunications sector. From a policy perspective, TIA's Technical Regulatory Policy Committee ("TRPC") serves as a consensus manufacturer partner with the FCC, telecommunications certification bodies ("TCBs") and other stakeholders towards streamlining and clarifying the mechanisms of equipment certification processes and procedures. See <https://www.tiaonline.org/policy>.

² See Office of Engineering and Tech., FCC, Draft Laboratory Division Publications Report, Electronic Labelling Guidance, Publication 905462 (May 9, 2014), available at <https://apps.fcc.gov/eas/comments/GetPublishedDocument.html?id=369&tn=716718>.

TIA urges the FCC to clarify its requirements and implementation expectations regarding DFS components of devices in the introduction to this KDB. TIA regards the 5 GHz Report & Order's limitations on sales of older systems to address only 5 GHz equipment falling under Part 15.247, and not equipment which uses the testing methodology provided by the FCC Labs in its previous (version 1) DFS testing methodology and approved under various KDBs referenced in this document.

TIA also urges the FCC Labs to clarify that bandwidth detection tests only need to use bin 0-4 radar types. We believe this will provide needed certainty regarding bandwidth detection tests for bins 5 and 6 by telecommunication certification bodies ("TCBs").

We respectfully request that OET Labs consider the above comments in its finalization of this KDB. Please contact us using the below information if we can be of more assistance.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Brian Scarpelli

Brian Scarpelli
Director, Government Affairs

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