Federal Communications Commission

U-NII-4-TO-DSRC EMC TEST AND MEASUREMENT PLAN

PHASE I: FCC LABORATORY TESTS

ET Docket No. 13-49

Comments Related to Document Dated:

October 7, 2016

Each main text comment is identifiedy by the original document:

1. Page number
2. Clause number
3. The paragraph number (starting at the top of the clause) or Figure number, when appropriate

Footnotes comments are identified by:

1. Reference number
2. Paragraph number starting at the top of the footnote

COMMENTS

**Page 3, Section II 2nd Paragraph :**

“*Thus, the testing described herein will primarily utilize the BSM frame structure with a packet length of 300 bytes, …”*

The acronym “byte”, historically, stands for “Bit Yoked Transfer Element” (IBM - 1958). Over the years it became synonymous to 8 bits entity. Actually, a byte may contain any number of bits (8, 9, 12, 16, etc.). The correct unambiguous name for an eight-bit element, is an “octet”.

**Page 7 Section IV B - Benchtop Interference Susceptibility Tests 2 – DSRC Baseline Testing 4th Paragraph:**

“*Specifically, the interference susceptibility tests will be performed assuming DSRC reception at the minimum sensitivity level (representative of edge-of-coverage, or “worst case” signal conditions), the minimum sensitivity level + 15 dB, (representative of nominal signal conditions), and the minimum sensitivity level + 25 dB (representative of ideal signal conditions).”*

This section is unclear. The receiver input minimum input sensitivity on a 10 MHz channel spacing ranges from -85 dBm to -68 dBm, depending on modulation and coding rate (Ref. IEEE 802.11-2012; 18.3.10.2.

**Page 7 Section IV B - Benchtop Interference Susceptibility Tests 3 – Test Channel 1st Paragraph**

“*The seven DSRC channels are further segregated into a control, two Public Safety, and four general service channels.”*

Except for the control channel, all other channels are Service Channel. All service channels can be assigned for public service applications. However, two channels 172 & 184 are “*designated for public safety applications involving safety of life and property (ref: 47 CFR 377 (b 2))*”.

**Page 7 Section IV B - Benchtop Interference Susceptibility Tests 3 – Test Channel 2nd Paragraph**

DSRC provides the capability of two 20 MHz channels; 175 and 181.

**Page 9 Section IV B. Benchtop Interference Susceptibility Tests 5-Test Approach 1st Paragraph Last Bullet**

*“(proposed U-NII-4 channel 175)”*

Reminder that U-NII-4 Channel 175 is not the same frequency than DSRC Channel 175.

**Page 10 Section IV C. Interférence Mitigation Tests 1 Re-channelization Mitigation Stratégie 1st Paragraph :**

*“the strategy proposes to move the channel currently dedicated to Public-Safety V2V messaging (i.e., channel 172) onto one of the three upper channels above 5895 MHz”*

DSRC Channel 172 is not dedicated to Public-Safety, but *designated for public safety applications involving safety of life and property (ref: 47 CFR 377 (b 2))*”. By definition, these applications have the highest priority.

**Page 10 Section IV** C **Interférence Mitigation Tests 2 Detect and Vacate Mitigation Strategy 3rd Paragraph**

*“…and is intended to be independent of, and concurrent to, traditional CCA operation as specified in the 802.11ac standard”.*

CCA/CD is not exclusive to IEEE 802.11ac; it was already specified in IEEE 802.11-2007. While IEEE 802.11ac is mentioned here, it was published in 2013. That is one year after the reference IEEE 802.11-2012. Therefore, 802.11-2012 could not contain the 802.11ac amendments.

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