

ET DOCKET 13-49

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From: David Boldy [<mailto:dboldy@broadcom.com>]

Sent: Thursday, November 12, 2015 2:30 PM

To: Mark Settle <Mark.Settle@fcc.gov>

Cc: Ira Keltz <Ira.Keltz@fcc.gov>

Subject: Reconsideration of the cut off date for UNII-3 devices certified under 15.247.

Accepted / Filed

NOV 18 2015

Federal Communications Commission
Office of the Secretary

Dear Mark ,

At the Oct 2015 TCB conference in Baltimore Ira Keltz presented a slide: "Additional Issues on Reconsideration" which detailed the following bullet:

- Reconsider two-year from effective date cut-off of UNII-3 certified devices under 15.247

Our understanding is that this is a reconsideration to allow an extension beyond the June 2, 2016 deadline (detailed in KDB 926956) for devices shipping to the "Old rules".

During a chat with Ira afterwards he advised that if we had any concerns with regards this that you would be the appropriate contact to raise these with.

With this in mind Broadcom Corporation are in strong support for an extension to allow for sufficient time to phase out products certified under the old rules. In particular for products near to end of life that will remain unchanged, an extension will avoid having to perform permissive change updates, costing Broadcom, and industry in general, a significant amount of re-approvals expense and potentially causing blockages at labs that would affect the introduction of newer technology.

In addition, any updates to the "New rules" for these end of life devices would require driver changes and significant internal expenses which may in fact be redundant work (i.e. the majority of products would be client devices without radar detection and during an extension these unchanged shipping products would not create any new concerns for harmful interference).

With the above in mind we would be grateful if you could consider the following extension request:

- For devices approved under Part 15.247 "old Rules": Last sell date – Dec 2 2017 or later

We believe that the above timeframe would allow Broadcom and our customers the time required to clear out channels of products approved to the "Old rules" without imposing a further burden on industry.

Your Sincerely,

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David Boldy
Associate Technical Director
Broadcom Corporation

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