

In consideration of Paragraphs 67 and 68 in FCC 13-19, ET Docket No. 13-44 about incorporation of ANSI C63.4-2009 into the Commission's Rules Part 15, and in particular the question raised in Paragraph 68 about inclusion of the revised wording in C63.4-2009 regarding the "2 dB rule", I would like to point out that unless this rule is excluded then there may be confusion with the text of Section 15.31(i) of the Commissions Rules which states in part "In the case of multiple accessory external ports, an external accessory shall be connected to one of each type of port. Only one test using peripherals or external accessories that are representative of the devices that will be employed with the equipment under test is required".

As this is inconsistent with the clause on multiple ports in C63.4-2009, I suggest a modification to Section 15.31(i) to clarify that it takes precedence over the description in C63.4 unless the Commission decides that the the method described in C63.4-2009 is to be used exclusively (which I disagree with for the reasons already raised in comments submitted by others). Either way, the text of 15.31(i) should be appropriately amended to remove any confusion/contradiction.

Respectfully submitted,
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