



**Wireless Innovation Forum's comments to
the FCC regarding the proposed publication
for authorization of CBSD – CBSD
handshake for SAS access**

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | 940660 D02 |
| CBSD-CBSD Handshake |) | CBSD FAQ v01 |
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COMMENTS OF THE WIRELESS INNOVATION FORUM

The Wireless Innovation Forum (WinnForum) appreciates the work that the FCC has done, and the fact that the draft KDB closely reflects the consensus of its task group charged with defining the CBSD-CBSD handshake. We do however call attention to specific issues that merit attention.

A pressing issue is the requirement, which was not part of the WinnForum draft, that the transmission must be "at levels no higher than those authorized by SAS for the BTS-CBSD". The BTS-CBSD does not transmit its grant value in any air interface, so the CPE-CBSD cannot know, in advance, what that power level is. Nor is there provision for the CPE-CBSD to query the SAS about the grant level of the BTS-CBSD. The preceding clause, "at the lowest power necessary for communications with the BTS-CBSD", already requires the CPE-CBSD to limit its power. Hence this proposed requirement cannot realistically be implemented, nor can it be tested. We thus request that it be removed, and that the bullet item simply read, "at the lowest power level necessary for communications with the BTS-CBSD".

Another issue concerns the wording of the Pre-Approval Guidance requirement. The specific level of detail requested from manufacturers in the current language seems excessive,

inasmuch as test labs will need to hold all approved devices responsible for meeting all of the KDB requirements, and common test procedures should be used. These requirements already define maximum permitted transmission times and repetition rates, and hold CPE-CBSDs to a higher standard for avoiding interference than EUDs using the same or higher conducted power with a less-directional antenna. WinnForum will be suggesting test procedures; we do not expect manufacturers to submit their own. We thus suggest replacing the first paragraph in the draft KDB under the heading "Equipment Authorization Procedures" with language based upon that in the existing CBSD KDB 940660 D01:

“CPE-CBSDs are currently on the Pre-Approval Guidance (PAG) list (§ 2.964). A CBSD sample must be submitted to the FCC for pre-approval testing prior to approval by a TCB. See KDB Publication 388624 D01 and D02 for detailed PAG procedures”.

Respectfully submitted,

By /s/:
Bruce Oberlies
President and Chair
The Wireless Innovation Forum

22 March, 2019