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#### Comment Type: TR

The replaced Figure 90–1 has signals TX_NUM_BIT_CHANGE and RX_NUM_BIT_CHANGE which appear to be part of the xMII. However, none of the xMII defined in the standard include such signals.

In 90.5.3 and 90.5.4 these signals are defined as "logical signals intended for use with an intra-chip interface. A physical instantiation of these signals is not defined" - which is inconsistent with several of the xMII definitions.

If necessary, these signals can be defined as a new optional interface, instead of changing the existing multiple xMII.

Note that in the replaced Figure 90–2 these signals do appear separately from the xMII signals.

**Suggested Remedy**

Make the dashed line under "xMII" shorter such that it does not encompass the new signals, to clarify that they are not part of the xMII interfaces.

**Response**

ACCEPT IN PRINCIPLE.

Made the dashed line under "xMII" shorter such that it does not encompass the new signals, to clarify that they are not part of the xMII interfaces.

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#### Comment Type: TR

"In addition, an optional bundle of sixteen logical transmit signals (TX_NUM_BIT_CHANGE<15:0>) and an optional bundle of sixteen logical receive signals (RX_NUM_BIT_CHANGE<15:0>) are output from the PHY to the gRS."

Since these signals are optional, they _may_ be output from the PHY to the gRS.

Also, as defined in the management registers there is only one option common to both TX_NUM_BIT_CHANGE<15:0> and RX_NUM_BIT_CHANGE<15:0> - so it's not two optional bundles.

Also, as noted in another comment, the xMII's are not redefined by this amendment, so these signals are _not_ part of the xMII.

**Suggested Remedy**

Change the quoted sentence to

"In addition, an optional bundle of sixteen logical transmit signals (TX_NUM_BIT_CHANGE<15:0>) and sixteen logical receive signals (RX_NUM_BIT_CHANGE<15:0>) may be output from the PHY to the gRS."

**Response**

ACCEPT IN PRINCIPLE.

Changed the quoted sentence to

"In addition, an optional bundle of sixteen logical transmit signals (TX_NUM_BIT_CHANGE<15:0>) and sixteen logical receive signals (RX_NUM_BIT_CHANGE<15:0>) may be output from the PHY to the gRS."
Comment Type: ER  Comment Status: A

"for enabling the calculation of highly accurate path data delay values"
This reads like promotional text; "highly accurate" is subjective.

Suggested Remedy
- Change the quoted text to
  "for enabling the calculation of higher accuracy path data delay values"
- In 90.5.3 and 90.5.4, change "high accuracy" to "higher accuracy".

Response  Response Status: W
ACCEPT IN PRINCIPLE.

The first issue was incorporated into response to comment I-51
In 90.5.3 and 90.5.4, changed "high accuracy" to "higher accuracy".

Comment Type: TR  Comment Status: A

"The value reports number of xMII bit times of dynamic transmit path data delay that are experienced by the data transferred from the gRS to the PHY, relative to the mean PCS transmit path data delay"

This description may not address dynamic delays caused by possible extender sublayers (XS) which are functionally similar to the PCS, but specified separately. The XS should be mentioned because, ideally, the value of TX_NUM_BIT_CHANGE should represent the sum of the dynamic delays caused by the PCS, the XS, and any other sublayers (e.g. FEC if it is separate), not just the PCS; and if there are multiple xMII instances, each one should have its own TX_NUM_BIT_CHANGE.

Similarly for RX_NUM_BIT_CHANGE in 90.5.4.

Suggested Remedy
- At the least, change "mean PCS transmit data delay" to "mean PHY transmit data delay".
- Preferably, add some statements about PHYs with intermediate xMII instances (using XS) and the need to have multiple TX_NUM_BIT_CHANGE values in that case.

Response  Response Status: W
ACCEPT IN PRINCIPLE.

Changed "mean PCS transmit data delay" to "mean PHY transmit data delay".
Applied similar changes in 90.5.4.