IEEE P802.11  
Wireless LANs

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| Resolutions to Regulatory Comments | | | | |
| Date: August 1, 2018 | | | | |
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Abstract

This submission proposes resolutions for LB232 Regulatory CIDs 1418, 1445, 1446, 1604, 1605, 1606, 1608 and 1621.

Revisions:

* Rev 0: Initial version of the document.
* Rev 1: discussed Aug 1 ad hoc
* Rev 2: as discussed Aug 1 ad hoc

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| **CID** | **Commenter** | **Pg / Ln** | **Section** | **Comment** | **Proposed Change** | **Resolution** |
| 1418 | Peter Ecclesine | 3972.01 | Annex E.1 | Should not have channel sets in global operating class since not all channels in the given channel sets are valid in all regdoms | Delete the Channel set and Channel center frequency index columns from Table E-4 (please contact me if you need any more details on what this means as this comment was previously rejected as "fails to identify changes in sufficient detail so that the specific wording of the changes that will satisfy the commenter can be determined" but I cannot find anything unclear or insufficiently detailed in this proposed change) | **Revised**  Agree to change definition of channel sets to indicate that not all channels must be supported. For most countries, global operating classes are the only recitation of what channels can be in a class. Behavior limits sets are not sufficiently defined to determine a global channel set from Channel Starting Frequency and Channel Spacing.  **TGm Editor, please make changes as shown in document 11-18/1366r2 having a tag [1418]** |
| 1445 | Mark RISON | 3964.01 | Annex E.1 | Operating classes serve no purpose except confusion | At the start of E.1 insert "The use of operating classes is deprecated." | **Rejected**  Operating classes are a container whose class value is necessary to calculate the center frequency for radio measurement, radio management and extended channel switching in a radio domain. Use of center frequency for operation is specific to each PHY. A operating class value may indicate an enumerated list of behavior limits in various regulatory domains. |
| 1446 | Mark RISON | 3964.01 | Annex E.1 | It is not clear exactly what an operating class defines, e.g. whether it defines all the channels all STAs supporting that OC are required to be able to operate on, or whether it defines all the widths all STAs supporting that OC are required to be able to operate on on all those channels | At the start of E.1 insert "A STA shall be capable of operating on all the channels and all the channel widths defined by the operating classes that it supports." | **Revised**  Agree to revise the statement about what an operating class defines in Annex E.1.  **TGm Editor, please make changes as shown in document 11-18/1366r2 having a tag [1446]** |
| 1604 | Peter Ecclesine | 3980.18 | Annex E.2.2 | Band specific operation for US 3650-3700 is changing because Part 96 CBRS rules are sunsetting Part 90 subpart Z in May of 2020. | A statement that Part 96 CBRS rules will sunset Part 90 Subpart Z rules in May 2020 should be added. | **Revised**  Agree to add text to Annex E.2.2 regarding Part 90 Subpart Z rules.  **TGm Editor, please make changes as shown in document 11-18/1366r2 having a tag [1604]** |
| 1605 | Peter Ecclesine | 3213.01 | Annex A | The versions in References B15 and B16 are no longer valid | Remove version numbers | **Revised**  Agree to change non-current title, but reference should be to most recently published standard.  **TGm Editor, please make changes as shown in document 11-18/1366r2 having a tag [1605]** |
| 1606 | Peter Ecclesine | 3212.00 | Annex A | B14 is now under RED, not R&TTE, and reference title should be current | Update Title of EN 300 328 | **Revised**  Agree to change non-current title, but reference should be to most recently published standard.  **TGm Editor, please make changes as shown in document 11-18/1366r2 having a tag [1606]** |
| 1608 | Peter Ecclesine | 137.26 | 2 | The title of EN 301 893 has changed to be under RED | Update Title of EN 301 893 | **Revised**  Agree to change non-current title, but reference should be to most recently published standard.  **TGm Editor, please make changes as shown in document 11-18/1366r2 having a tag [1608]** |
| 1621 | Albert Petrick | 3957.00 | Annex D | The group should consider adding references to extend the frequency band to 7.125 GHz. Clause 21 VHT PHY may have to be updated as well. 802.11ax plans to include references to 7.125 GHz in the TG draft. | As commented | **Rejected**  There are no regulations to cite for 802.11 VHT operation between 5.925 GHz and 7.125 GHz at any transmit power above -41.3 dBm per MHz EIRP (FCC 47 CFR 15.250(d)(1)). We await any rulemaking before changing Annex D and other clauses. |

This document uses REVmd draft 1.2 as the baseline.

**2. Normative references**

***TGm Editor: [1608] Please change the following at the end of the 2nd reference in this section (REVmd D1.2, P149L34):***

ETSI EN 301 893, Broadband Radio Access Networks (BRAN); 5 GHz high performance RLAN; ~~Part 2:~~

~~Harmonized EN covering essential requirements of article 3.2 of the R&TTE Directive~~(latest Official Journal of the European Union published version).2

**3.2. Definitions specific to IEEE Std 802.11**

***TGm Editor: [1446] Please change the following definition in this section (REVmd D1.2, P186L39):***

**operating class:** An E.1 (Country information and operating classes) index into a set of values for radio operation in ~~a~~ one or more regulatory domains.

**Annex A**

***TGm Editor: [1606] Please change the following at the end of the 14th reference in this section (REVmd D1.2, P3459L53):***

[B14] ETSI EN 300 328, Electromagnetic compatibility and Radio spectrum Matters (ERM); Wideband

transmission systems; Data transmission equipment operating in the 2,4 GHz ISM band and using wide band modulation techniques; (latest Official Journal of the European Union published version)~~Harmonized EN covering essential requirements under article 3.2 of the R&TTE Directive~~.50

***TGm Editor: [1605] Please change the 15th and 16th references in this section (REVmd D1.2, P3460L01):***

[B15] ETSI EN 302 571 ~~V1.1.1 (2008-09)~~, Intelligent Transport Systems (ITS); Radiocommunications

equipment operating in the 5 855 MHz to 5 925 MHz frequency band; (latest Official Journal of the European Union published version)~~Harmonized EN covering the essential requirements of article 3.2 of the R&TTE Directive~~.

[B16] ETSI ES 202 663 ~~V1.1.0 (2010-01)~~, Intelligent Transport Systems (ITS); European profile standard

for the physical and medium access control layer of Intelligent Transport Systems operating in the 5 GHz

frequency band; (latest Official Journal of the European Union published version).

Annex E.1 Country information and operating classes

***TGm Editor: [1446] Please change the description of operating class in the third paragraph in this section (REVmd D1.2, P4244L32):***

The operating class value is an index into ~~a~~ sets of values for radio operation in a regulatory domain. An operating class value indicates:

- the frequencies corresponding to channel numbers (they are defined in PHY clauses)

- the channel center frequencies that may be used (they are defined in PHY clauses)

- the maximum channel width that may be used

- behavioral constraints listed in Table D-2 (Behavior limits)

~~The operating class tables also contain pointers to behaviors and signal detection limits in Annex D where further operational requirements may be found.~~

***TGm Editor: [1418] Please change the description of the channel set in the sixth paragraph in this section (REVmd D1.2, P4244L47):***

The channel set is the list of integer channel numbers that are legal for a regulatory domain and class. A “—” in the Channel set column of the operating classes tables (Table E-1 (Operating classes in the United States) to(#240) Table E-6 (Operating classes in China)) indicates either that the values in the channel center frequency index field apply for calculating channel center frequencies of this operating class, or where both the channel set field and the channel center frequency index field are “—” indicates that the channel set is not defined by the operating class and is derived from regulation. It is not required that a station supports operation on any of the channels in the channel set.

Annex E.2.2 3650-3700 MHz in the United States

***TGm Editor: [1604] Please insert new first paragraph in this section (REVmd D1.2, P4260L38):***

FCC Part 96 rules for operation in the 3550-3700 MHz frequency band are in force, and operating in the 3650-3700 MHz band under Part 90 Subpart Z rules ends May 2020. The following text in this subclause contains requirements for operation under Part 90 Subpart Z rules.