Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

Attn: Office of Engineering and Technology.
FCC ID: Q9DAPEX0565567
Models: APEX0565 & APEX0567
Applicant: Aruba Networks
Date: August 28,2020

To Whom It May Concern:

We, Aruba Networks submit this formal request to the FCC Authorization and Evaluation Division for an Expedited Review for the DFS radar testing required by KDB 388624 D01 Pre-Approval Guidance (PAG) Procedure on FCC ID: Q9DAPEX0565567

Reasoning for Expedited Review:

The APEX0565567 (FCC ID: Q9DAPEX0565567) and the APIN0504/APIN0505 (FCC ID: Q9DAPIN0504505) utilize the same Broadcom RF Chipset Model: BCM47622) but have different PCB form factors, housing and Antenna gains. The APEX0565 utilizes 2 x Cross-Polarized Dual-Band Internal Antenna's with gains of 3.2dBi (2.4GHz) and 5.4dBi (5GHz) & the APEX0567 has antenna gains of 6.8dBi (2.4GHz) and 7.1dBi (5GHz). The APIN0504 utilizes 2 (female) RP-SMA connectors for External Antennas with lowest gains of 2.0dBi in (2.4GHz and 5GHz) Band, while the APIN0505 utilized 2 integrated dual-band antennas with gains of 4.9dBi (2.4GHz) and 5.7dBi (5GHz) Band. FCC ID: Q9DAPIN0504505 DFS Verification testing was performed at the FCC on December 10, 2019. The DFS detection functionality has not been changed between these devices.

Please refer to page 2 for the "Expedited Review Information" table.

Sincerely,

Signature
Name/Position: Phillip Carranco / Manager Regulatory Compliance
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Expedited Review Required Information

	FCC ID(s) of Previously Granted DFS Devices Q9DAPIN0504505	FCC ID of New Application Q9DAPEX0565567
Technology (802.11x, frame based, MIMO, smart antenna, etc.)	802.11ax / MIMO	802.11ax / MIMO
Bandwidth information and differences	20, 40 and 80MHz	20, 40 and 80MHz
Antenna Information	DFS Testing: 2.0dBi	DFS Testing APEX0565: 5.4dBi
Differences in DFS functioning, circuitry, software, etc.	Uses Broadcom RF Chipset Model: BCM47622 and DFS waveform detection mechanism	Uses Broadcom RF Chipset Model: BCM47622 and DFS waveform detection mechanism
Differences between the products such as Tx Power, modulation, receivers, processing circuitry	Supports 2 Tx / 2 Rx paths 18 dBm per path	Supports 2 Tx / 2 Rx paths 18 dBm per path
Name of Test Labs for Various Grants	MRT Technology (Taiwan) Co	Sporton International Inc.