IEEE P802.3ck D3.0 100/200/400 Gb/s Electrical Interfaces Task Force Initial Sponsor ballot comments

| Cl 91 | $S C 91$ | P 89 | $L 5$ |
| :--- | :--- | :---: | :---: |
| Ran, Adee | Cisco Systems, Inc. | \# l-40 |  |

Comment Type
The amendment of clause 91 has subclauses under 91.5 and 91.5 .2 without the full hierarchy. It is common to include the full hierarchy of each amended subclause.

## SuggestedRemedy

Add headings for:
91.5 Functions within the RS-FEC sublayer
91.5.2 Transmit function

Proposed Response Response Status W
PROPOSED ACCEPT.

| $C l 91$ | $S C$ 91.5.3.3 | P 89 | L 31 |
| :--- | :--- | :---: | :---: |
| Ran, Adee | Cisco Systems, Inc. | \#-41 |  |

Comment Type ER Comment Status D
(bucket1)

The amended text in this paragraph refers to "This option", without stating what option it
is... (it is the option to bypass error correction)
It would be easier for readers to understand the requirement if the option is stated explicitly. SuggestedRemedy

Include the entire third paragraph from the base document. In 802.3dc the text is:
The Reed-Solomon decoder may provide the option to perform error detection without error correction to reduce the delay contributed by the RS-FEC sublayer. The presence of this option is indicated by the assertion of the FEC_bypass_correction_ability variable (see 91.6.8). When the option is provided, it is enabled by the assertion of the

FEC_bypass_correction_enable variable (see 91.6.1). This option... <remainder of the text as in D3.0>

## Proposed Response Response Status

PROPOSED ACCEPT

| CI 91 | SC 91.7.3 | P 92 | L 41 |
| :--- | ---: | ---: | ---: |
| Dawe, Piers J G | NVIDIA |  | \#-165 |
| Comment Type T | Comment Status D |  | (bucket1) |

There is a "major capability/option" "RS-FEC-Int is supported. 161 Used to form complete 100GBASE-CR1, or 100GBASE-KR1 PHY"
I don't see text in this clause or in 161 to justify this.
SuggestedRemedy
Add the text. In 161, state which PHY types use the RS-FEC-Int
Proposed Response Response Status W
PROPOSED ACCEPT IN PRINCIPLE
Change *FINT row so that it is named *KP1, with feature "100GBASE-CR1, or 100GBASE-
KR1 PHY", with subclause cell blank, and existing value/comment. Move this row so it comes before the *KP4 row.
Change "FINT:M" to "KP1:M" in the status column of the FE row on line 44

| Cl 161 | SC 161 | P 133 | L 4 | \# 1-8 |
| :---: | :---: | :---: | :---: | :---: |
| Nicholl, Shawn |  | Xilinx |  |  |

Comment Type E Comment Status D
The latest P802.3/D3.0 (i.e. 802.3 dc ) nows uses lowercase "forward error correction", where previously uppercase was used
SuggestedRemedy
For P802.3ck, propose to change the Clause 161 title to lower case.
Also, within the text body of Clause 161 propose to change to lowercase other places where "Forward Error Correction" is currently found.
Proposed Response Response Status W
PROPOSED ACCEPT.


With the breaking up of 161.5.2.6 into two sub-clauses the introduction paragraph could use some pointers towards which sub-clause it's referring to.
SuggestedRemedy
Add "(see 161.5.2.6.2)" after the word re-inserted on line 46
Add "(see 161.6.2.6.1)" at the end of the first sentence of 161.5.2.6
Proposed Response Response Status W
PROPOSED ACCEPT.

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| Cl 161 | SC 161.5.2.6 | P 135 | L 3 |
| :--- | :---: | :---: | :---: |
| Ben-Artsi, Liav | Marvell Semiconductor, Inc. | \# I-238 |  |

Comment Type TR Comment Status D (bucket1)
In figure 161-2 it seems that this FEC does not support EEE. If such is desired
recommend amending in a similar manner as Figure 91-2 in clause 91
SuggestedRemedy
Add EEE support similar to Figure 91-2 in clause 91
Proposed Response
Response Status W
PROPOSED REJECT.
EEE is not an objective of P802.3ck
The baseline proposal says EEE deep sleep is not supported (see
https://www.ieee802.org/3/ck/public/19_05/nicholl_3ck_01_0519.pdf)


The introduction paragraph and the first sentence of this sub-clause call this a "function"

## SuggestedRemedy

Change the sub-clause title to be "Alignment marker mapping function"
Proposed Response Response Status W
PROPOSED ACCEPT.

| $C l 161$ | $S C$ | 161.5.2.6.1 | P 136 |
| :--- | :---: | :---: | :---: |
| Ran, Adee | Cisco Systems, Inc. | L | I-43 |

isco Systems, Inc
(bucket1)
Comment Type E Comment Status D
The variable x is inconsistency italicized in the text of list items a-c.

Cl 161 161.5.2.6.2 Ran, Adee Cisco Systems, Inc.
Comment Type E Comment Status D
(bucket1)
" $x$ " should not be used as a multiplication symbol.
Also applies in 161.5.3.5.
SuggestedRemedy
Change to a multiplication symbol as in the last paragraph of 161.5.2.6.1, in both places.
Proposed Response Response Status W
PROPOSED ACCEPT.

| CI 161 SC 161.5.2.6.2 | P 137 | L 6 | \# I-166 |
| :--- | ---: | ---: | ---: | ---: |
| Dawe, Piers J G | NVIDIA |  |  |
| Comment Type T | Comment Status D |  | (bucket1) |

What do you mean, "let"? In IEEE standards, we have shall, should, may and can. See 1.1.6.

## SuggestedRemedy

Change "Let the set of vectors tx_scrambled_i<256:0> represent consecutive values of tx_scrambled<256:0>" to "In the following, the set of vectors tx_scrambled_i<256:0> represent consecutive values of tx_scrambled<256:0>", or "Consecutive values of x_scrambled<256:0> are represented by a set of vectors tx_scrambled_i<256:0>"
Or use "Given" as on the previous page.
Proposed Response Response Status w
PROPOSED REJECT.
This text is consistent with the text in 119.2.4.4.1 in the base standard from which it is derived. The word "let" is used in this manner throughout Clause 91 and similar clauses. It is also a common form for defining a variable in a function

## SuggestedRemedy

Make x italic wherever it denotes a lane number
Proposed Response Response Status w
PROPOSED ACCEPT.

IEEE P802.3ck D3.0 100/200/400 Gb/s Electrical Interfaces Task Force Initial Sponsor ballot comments

| Cl 161 | SC 161.5.2.6.2 | P 137 | L 6 |
| :--- | :--- | :--- | :--- |
| Marris, Arthur | Cadence Design Systems, Inc. |  | I-4 |

## Comment Type T Comment Status

It would help understanding to point to where tx_scrambled is defined

## SuggestedRemedy

## Change:

"Let the set of vectors tx_scrambled_i<256:0> represent consecutive values of
tx_scrambled<256:0>."
To:
"Let the set of vectors tx scrambled $\mathrm{i}<256: 0>$ represent consecutive values of the transcoder output tx_scrambled<256:0> (see 161.5.2.5 for a definition of the transcoder)."
Proposed Response
Response Status W
PROPOSED ACCEPT.

| Cl 161 | $S C$ | 161.5.2.6.2 | $P 137$ |
| :--- | :---: | :---: | :---: |
| Nicholl, Shawn | Xilinx | L 7 | \# I-9 |

Nicholl, Shawn Xilinx
Comment Type E Comment Status D
(bucket1)
The variable tx_scrambled<256:0> is mentioned with little context to its origin or definition Readers of the sub-clause may not realize that the variable's detailed definition is found outside of the Clause 161. Including some guiding text may help the reader to navigate.

## SuggestedRemedy

Propose to change the sentence to

- "Let the set of vectors tx_scrambled_i<256:0> represent consecutive values of the
transcoder output tx scrambled<256:0> (see 161.5.2.5 for the definition of the transcoder)."
Proposed Response
Response Status
PROPOSED ACCEPT

| CI 161 | SC 161.5.2.6.2 | P 137 | L 7 | \# I-167 |
| :--- | ---: | ---: | ---: | ---: |
| Dawe, Piers J G | NVIDIA |  |  |  |
| Comment Type T | Comment Status D |  | (bucket1) |  |


Something called "tx_scrambled" appears without explanation. According to the text and
figures 161-4 and 161-5, it is 257 bits long (but what is it?), but according to Fig 161-3 it's 2 RS symbols or 20 bits.
SuggestedRemedy
In 161.5.2.5, add a sentence saying that the transcoder output is tx_scrambled which is a 257-bit block. In Figures 161-3, change "tx_scrambled" to "Beginning of tx_scrambled", pointing at row 0 , if that is what is intended.
Proposed Response
Response Status w
PROPOSED ACCEPT IN PRINCIPLE.
Comments 4 and 9 add a reference to 161.5.2.5 which defines $t x$ scrambled by
referencing 91.5.2.5 which makes clear the tx_scrambled is a 257 -bit block.
Make changes to Figure 161-3 in accordance with the response to comment 11

| Cl $161 \quad$ SC 161.5.2.6.2 | P 137 | L 22 | \# I-10 |
| :--- | :---: | :---: | :---: | :--- |
| Nicholl, Shawn | Xilinx |  |  |
| Comment Type E | Comment Status D |  | (bucket1) |

Comment Type E Comment Status D (bucket1)
The paragraph ending in "followed the alignment marker on each respective lane" leaves the reader thinking that some other text is meant to follow it.

## SuggestedRemedy

Propose to re-locate this paragraph to the area prior to the text "For a 10280-bit block without an alignment marker group". This enhances readability of the sub-clause by co locating the "with an alignment group" portions together
Proposed Response
Response Status
PROPOSED ACCEPT.

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| Cl 161 | SC 161.5.2.6.2 | $P 137$ | $L 36$ |
| :--- | :---: | :---: | :---: |
| Nicholl, Shawn | Xilinx |  | \# 11 |

Comment Type E Comment Status D (bucket1)
In Figure 161-3 tx scrambled is inserted into an area of $2 \times 10$ bits. However, tx scrambled is 257 bits wide. This causes confusion. The diagram should be clarified.

## SuggestedRemedy

P802.3/D3.0 (i.e. 802.3 dc ) Figure 119-5 and Figure 119-7 are very similar to Figure 161-3 and are the basis for the following proposed changes to Figure 161-3:

- Remove the arrow from the diagram
- Replace "FEC codeword A" with "from FEC codeword A"
- Replace "FEC codeword B" with "from FEC codeword B"
- Add shading to the final cell/column of the table (i.e. for the rows pertaining to FEC lane
$0-3$ ). The shading should be different colour from the 5 -bit pad shading
- Add superscript text "B A" into the newly shaded area for FEC lanes 1 and 3
- Add superscript text "A B" into the newly shaded area for FEC lanes 2
- Replace "tx scrambled" with "Resumption of 257 -bit blocks" or "Resumption of 257-bit tx scrambled blocks"
- If "Resumption of 257-bit tx_scrambled blocks" is chosen, then propose to make similar text change to Figure 119-5 and Figure 119-7 through maintenance of P802.3/D3.0 (i.e. 802.3dc)
- Beside the new text, add an " $=$ " (equal symbol) and a rectangle that is shaded the same colour as the newly shared area
- Note that this diagram is also consistent with latest P802.3/D3.0 (i.e. 802.3dc) Figure 91 4 and ideally will remain consistent with Figure 91-4


## Proposed Response

Response Status W
PROPOSED ACCEPT IN PRINCIPLE
The commenter has made a similar comment against Clause 91 in the ballot against draft 3.0 of the 802.3 dc revision project. Draft 3.1 of the revision project is expected to be published before draft 3.1 of 802.3ck.
Implement the suggested remedy with editorial licence and as far as possible maintain consistency with Figure 91-4 in draft 3.1 of the 802.3 dc revision project.

| CI $161 \quad$ SC 161.5.2.6.2 | P 137 | L 44 | \# I-12 |
| :--- | :---: | :---: | :---: |
| Nicholl, Shawn |  | Xilinx |  |
| Comment Type E | Comment Status D | (bucket1) |  |

In Figure 161-4 tx_scrambled is mentioned in several places -- for an area of $35 \times 257$-bit and also in an area of $40 \times 257$-bit. However, tx_scrambled is 257 bits wide.

## SuggestedRemedy

Propose to make the following change(s) to Figure 161-4:

- Replace (in two places) "am_txmapped 5x257-bit blocks" with "am_txmapped ( $5 \times 257$ bits)"
- Replace (in two places) "tx_scrambled $35 \times 257$-bit blocks" with " $35 \times 257$-bit tx_scrambled blocks"
- Replace "tx_scrambled 40x257-bit blocks" with "40x257-bit tx_scrambled blocks"
- Note that this diagram is consistent with latest P802.3/D3.0 (i.e. 802.3dc) Figure 119-6
and Figure 119-8 and ideally will remain consistent with Figure 119-6 and Figure 119-8
Proposed Response
Response Status W
PROPOSED ACCEPT IN PRINCIPLE
The commenter has made a similar comment against Clause 119 in the ballot against draft
3.0 of the 802.3 dc revision project. Draft 3.1 of the revision project is expected to be published before draft 3.1 of 802.3 ck
Implement the suggested remedy with editorial licence and as far as possible maintain consistency with Figure 119-6 in draft 3.1 of the 802.3 dc revision project.
Also rename 161-4 to "Alignment marker insertion period"

| $C l 161$ | $S C$ | 161.5.2.6.2 | $P 137$ |
| :--- | :---: | :---: | :---: |
| Nicholl, Shawn | Xilinx | $L 50$ | \# I-13 |

Nicholl, Shawn Xilinx
Comment Type ER Comment Status D
(bucket1)
Figure 161-4 has the wrong caption.
SuggestedRemedy
Propose to replace the Figure 161-4 caption with:

- Figure 161-4 Alignment marker insertion period

Proposed Response
Response Status W
PROPOSED ACCEPT.

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| Cl $161 \quad S C$ 161.5.2.6.2 | $P 137$ | $L 54$ | \# I-14 |
| :--- | :---: | :---: | :---: |
| Nicholl, Shawn | Xilinx |  |  |

Comment Type E Comment Status D (bucket1)
In order to enhance readability and help readers to mentally connect together sections that
are called by reference, the draft should include some detail about how
tx_scrambled_am<10279:0> is consumed.

## SuggestedRemedy

Propose to add a new final paragraph at the end of 161.5.2.6.2 with the following text:

- the contents of tx_scrambled_am<10279:0> are an input to the Pre-FEC distribution (see 161.5.2.7 for the definition of the Pre-FEC distribution)
Proposed Response Response Status W
PROPOSED ACCEPT.

| CI 161 | SC 161.5.4.2.1 | $P 142$ | $L 46$ |
| :--- | :---: | :---: | :--- |
| Nicholl, Shawn | Xilinx | \# l-15 |  |

Comment Type E Comment Status D (bucket1)
Recently, P802.3/D2.3 (i.e. 802.3dc) introduced fec_lane_mapping<x> to the list of variables in 91.5.4.2.1. It seems appropriate to similarly update CL161.

## SuggestedRemedy

Propose to insert fec_lane_mapping<x> after fec_lane.
For fec_lane_mapping<x> definition propose to use: "Identical to the definition of fec_lane in 91.5.4.2.1 except that 161.6.8 defines the FEC lane mapping."

- Note that this sub-section number may be changed by a related comment against the draft.

Proposed Response
Response Status
PROPOSED ACCEPT.


Multiple instances of the term "both", and both = and. This appears verbose and perhaps ambiguous.

Confusing statement:
If current_pcsl and first_pcsl both found a match and indicate the same PCS lane number, amp_match is set to true. Otherwise, amp_match is set to false.
SuggestedRemedy
Review and remove the term "both".
Suggested modification:
If current_pcsl and first_pcsl match and indicate the same PCS lane number, amp_match is set to true. Otherwise, amp match is set to false.

Proposed Response
Response Status W
PROPOSED REJECT.
The commenter has not explained why the existing text is confusing
The text is similar to existing text in the base standard in 119.2.6.2.3
The suggested remedy does not improve upon the accuracy or clarity of the existing text.

| Cl $161 \quad$ SC 161.6 | P 146 | $L 19$ | \# I-16 |
| :--- | :---: | :---: | :---: |
| Nicholl, Shawn |  | Xilinx |  |
| Comment Type | ER | Comment Status D |  |
| (bucket1) |  |  |  |

The latest P802.3/D3.0 (i.e. 802.3 dc ) Table $91-3$ lists rows sorted by "Register/bit number" it seems appropriate for P802.3ck Table 161-2 to do the same.

SuggestedRemedy
Summary of proposed changes to P802.3ck CL161:

- move "1.201.3" higher in the table (i.e. after 1.201.2)
- move "1.201.4" higher in the table (i.e. after the new location of 1.201.3)
- move "1.207 to 1.209" higher in the table (i.e. after 1.206)

Proposed Response
Response Status W
PROPOSED ACCEPT.

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| Cl 161 | SC 161.6 | P 146 | L 49 |
| :--- | :---: | :---: | :--- |
| Nicholl, Shawn | Xilinx |  | \#-17 |

Comment Type ER Comment Status D (bucket1)
In the sub-sections of 161.6, a number of cross-references to sections of CL91 of the latest P802.3/D3.0 (i.e. 802.3dc) are incorrect. There are also some ordering issues with the sub-sections of 161.6

## SuggestedRemedy

Summary of proposed changes to P802.3ck CL161:

- pg. 146, line 49, 161.6.1 FEC_bypass_indication_enable: change "91.6.1" to "91.6.2"
- pg. 146, line 50, move the existing 161.6.10 FEC_degraded_SER_enable sub-clause after 161.6.1 FEC_bypass_indication_enable sub-clause to retain consistency with the order of entries in Table 161-1 ; update the FEC_degraded_SER_enable section to contain the text "Identical to the definition in 91.6.4, except the reference becomes 161.5.3.3.2." - pg. 146, line 50, move the existing 161.6.14 100G_RS_FEC_Int_enable after the new ocation of FEC_degraded_SER_enable to retain consistency with the order of entries in Table 161-1
- pg. 146, line 50, move the existing 161.6.11 FEC degraded SER activate threshold sub-clause after the new location of 100G_RS_FEC_Int_enable sub-clause to retain consistency with the order of entries in Table 161-1; update the
FEC_degraded_SER_activate_threshold section to contain the text "Identical to the definition in 91.6.5, except the reference becomes 161.5.3.3.2."
- pg. 146, line 50, move the existing 161.6.12 FEC_degraded_SER_deactivate_threshold sub-clause after the new location of FEC_degraded_SER_activate_threshold sub-clause ; update the FEC_degraded_SER_deactivate_threshold section to contain the text "Identical to the definition in 91.6.6, except the reference becomes 161.5.3.3.2."
- pg. 146, line 50, move the existing 161.6.13 FEC_degraded_SER_interval sub-clause after the new location of FEC_degraded_SER_deactivate_threshold sub-clause ; update the FEC_degraded_SER_interval section to contain the text "Identical to the definition in 91.6.6, except the reference becomes 161.5.3.3.2"
- pg. 146, line 53, 161.6.2 FEC_bypass_indication_ability: change "91.6.4" to "91.6.9" - pg. 147, line 3, 161.6.3 hi_ser: change "91.6.5" to "91.6.10"
- pg. 146, line 5, move the existing 161.6.20 FEC_degraded_SER_ability sub-clause after 161.6.3 hi_ser sub-clause to retain consistency with the order of entries in Table 161-2; update the FEC_degraded_SER_ability section to contain the text "Identical to the definition in 91.6.11, except the reference becomes 161.5.3.3.2."
- pg. 146, line 5, move the existing 161.6.21 FEC_degraded_SER sub-clause after the new location of FEC degraded SER_ability sub-clause ; update the FEC degraded SER section to contain the text "Identical to the definition in 91.6.12, except the reference becomes 161.5.3.3.2."
- pg. 147, line 7, 161.6.4 amps lock<x>: change "91.6.7" to "91.6.14"
- pg. 147, line 11, 161.6.5 fec_align_status: change "91.6.8" to "91.6.15"
-pg. 147, line 15, 161.6.6 FEC_corrected_cw_counter: change "91.6.9" to "91.6.16"
- pg. 147, line 1, 16. 18.6 FEC_corrected_cw_counter: change "91.6.9" to "91.6.16
pg. 147, line 23, 161.6.8 FEC_lane_mapping<x>: change "91.6.11" to "91.6.18"
-pg. 147, line 24, move the existing 161.6.22 FEC_cw_counter sub-clause after
FEC_lane_mapping<x> sub-clause to retain consistency with the order of entries in Table 161-2
pg. 147, line 27, 161.6.9 FEC symbol error counter i: change "91.6.12" to "91.6.19" - pg. 147, line 28 , move the existing 161.6.23 FEC_codeword_error_bin_i sub-clause after FEC symbol error counter i sub-clause to retain consistency with the order of entries in Table 161-2
- pg. 148, line 3, 161.6.15 align_status: change "91.6.13" to "91.6.20"
- pg. 148, line 7, 161.6.16 BIP_error_counter_i: change "91.6.14" to "91.6.21"
- pg. 148, line 11, 161.6.17 lane_mapping<x>: change "91.6.15" to "91.6.22"
- pg. 148, line 15, 161.6.18 block_lock<x>: change "91.6.16" to "91.6.23"
- pg. 148, line 19, 161.6.19 am_lock<x>: change "91.6.17" to "91.6.24"

Proposed Response Response Status W
PROPOSED ACCEPT IN PRINCIPLE
Implement the suggested remedy with editorial licence

| $C l 161$ | $S C$ | 161.6 .2 | $P 146$ |
| :--- | :---: | :---: | :---: |
| Marris, Arthur | Cadence Design Systems, Inc. |  | I |

Comment Type E Comment Status D
(bucket1)
Some of the cross references point to the wrong subclauses in Clause 91.
SuggestedRemedy
On page 146 line 49 change 91.6 .1 to 91.6.2
On page 146 line 53 change 91.6.4 to 91.6.9
On page 147 line 2 change 91.6 .5 to 91.6 .10
On page 147 line 7 change 91.6 .7 to 91.6.14
On page 147 line 11 change 91.6 .8 to 91.6 .15
On page 147 line 15 change 91.6 .9 to 91.6 .16
On page 147 line 20 change 91.6 .10 to 91.6 .17
On page 147 line 23 change 91.6 .11 to 91.6 .18
On page 147 line 28 change 91.6.12 to 91.6.19
On page 147 line 32 change 91.6 .2 b to 91.6.4
On page 147 line 35 change 91.6 .2 c to 91.6 .5
On page 147 line 39 change 91.6.2d to 91.6.6
On page 147 line 43 change 91.6 .2 e to 91.6 .7
On page 148 line 3 change 91.6 .13 to 91.6 .20
On page 148 line 7 change 91.6 .14 to 91.6 .21
On page 148 line 11 change 91.6 .15 to 91.6 .22
On page 148 line 16 change 91.6.16 to 91.6.23
On page 148 line 19 change 91.6 .17 to 91.6.24
Proposed Response
Response Status W
PROPOSED ACCEPT.

TYPE: TR/technical required ER/editorial required GR/general required T/technical E/editorial G/general COMMENT STATUS: D/dispatched A/accepted R/rejected RESPONSE STATUS: O/open W/written C/closed U/unsatisfied Z/withdrawn SORT ORDER: Clause, Subclause, page, line

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| $C l 161$ | $S C 161.6 .10$ | $P 147$ | $L 30$ |
| :--- | :---: | :---: | :---: |
| Ran, Adee | Cisco Systems, Inc. | \# $1-45$ |  |

Ran, Adee Cisco Systems, Inc.
Comment Type ER Comment Status D (bucket1)

The reference for FEC degraded SER enable is to 91.6 .2 b . This was the subclause
added in 802.3 cd . After integration into 802.3 dc , this became 91.6.4.
Simlarly in 161.6.11 through 161.6.13, 161.6.20, and 161.6.21.

## SuggestedRemedy

In 161.6.10 change the reference to 91.6.4.
In 161.6.11 change the reference to 91.6.5.
In 161.6.12 change the reference to 91.6.6.
In 161.6.13 change the reference to 91.6.7.
In 161.6.20 change the reference to 91.6.11.
In 161.6.21 change the reference to 91.6.12.

## Proposed Response Response Status

PROPOSED ACCEPT.

| Cl 161 | SC 161.7.3 | P 150 | $L 13$ |
| :--- | :---: | :---: | :---: |
| Ran, Adee |  | Cisco Systems, Inc. | \#-46 |
| Comment Type | E | Comment Status D |  |
| (bucket1) |  |  |  |

The "FEC degraded SER detection" option for this clause is defined in 161.5.3.3.2.
SuggestedRemedy
Change the reference of item *FDD from 91.5.3.3.1 to 161.5.3.3.2.
Similarly change item RF12 in 161.7.4.2.
Proposed Response Response Status
PROPOSED ACCEPT.

