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**Date: April 8, 2018**

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

**Attn: OET Dept.**

**Product/ Model Number:** 4K ATV Stick / SN5B6AX(X=A to Z), BEAST, SET210

## FCC SOFTWARE SECURITY DESCRIPTION

The information within this section of the Operational Description is to show compliance against the Software Security Requirements laid out within KDB 594280 D02 U-NII Security.

An applicant must describe the overall security measures implemented in the device that ensure that the device cannot be modified by any RF-related software changes by third parties to operate outside the authorized RF parameters without further approval from the FCC.

The description of the RF-related software must address the following questions in the operational description for the device and clearly demonstrate how the device meets the RF-security requirements.<sup>5</sup> While the Commission did not adopt any specific standards, it is suggested that the manufacturers may consider applying existing industry standards for security.<sup>6</sup>

This guide is not intended to be exhaustive and may be modified in the future. There may be follow-up questions based on the responses provide by the applicant for authorization.

SOFTWARE SECURITY DESCRIPTION	
General Description	1. Describe how any software/firmware updates for elements than can affect the device's RF parameters will be obtained, downloaded, validated and installed. For software that is accessed through manufacturer's website or device's management system, describe the different levels of security as appropriate. <a href="#">Re: It is bundled as part of a Software update, where user or installer cannot modify the content. All Installation &amp; update proceeds automatically once user accepts to update and install.</a>
	2. Describe the RF parameters that are modified by any software/firmware without any hardware changes. Are these parameters in some way limited such that any other software/firmware changes will not allow the device to exceed the authorized RF characteristics? <a href="#">Re: The channel/mode and associated power allocation are defined in a product specific country code regulatory parameter. defines the power levels and regulatory domain used by the wireless module based upon FCC certification. This regulatory domain is specific to this custom designed wireless module and only to specific customers/host integrators. The customers are responsible for the manufacturing and regulatory domain programming of the wireless module and integration into their systems. The customer agrees to the terms of the Letter of Authorization which explicitly states that they will not change critical regulatory parameters (e.g. regulatory domain). All parameters approved by the FCC are programmed in OTP or in both driver and firmware which would be embedded</a>

	<p>3. Describe in detail the authentication protocols that are in place to ensure that source of the RF-related software/firmware is valid. Describe in detail how the RF-related software is protected against modification.</p> <p>Re: This is a Limited modular approval for specific customers and hosts. The software version is distributed to the host integrators as a pre-built binary driver preventing any end user modifications. The Firmware/SROM/Flash is released to the host integrator/wireless module CM in Agile so it is a controlled release. Further to this the regulatory domain is programmed at the CM wireless module factory using an internal manufacturing tool. The internal manufacturing tool that is used to program the module's regulatory domain during the manufacturing process is proprietary and is not distributed to end-users.</p>
	<p>4. Describe in detail any encryption methods used to support the use of legitimate RF-related software/firmware.</p> <p>Re: No encryption, but wifi firmware is a binary code.</p>
	<p>5. For a device that can be configured as a master and client(with active or passive scanning), explain how the device ensures compliance for each mode? In particular if the device acts as master in some band of operation and client in another; how is compliance ensured in each band of operation?</p> <p>Re: There is a country code regulatory parameter to limit product to</p>

	<p>operate the device under its authorization in the U.S. This regulatory parameter would define which channel would be available to operate in active or passive scan to meet UNII requirements. The device would be set as a client device on all channels but also support P2P group owner mode on the non-DFS bands only.</p>
<p><b>Third-Party Access Control</b></p>	<p>1. Explain if any third parties have the capability to operate a U.S.-sold device on any other regulatory domain, frequencies, or in any manner that may allow the device to operate in violation of the device's authorization if activated in the U.S.  Re: NO.  There is a country code regulatory parameter to limit user to operate the device outside its authorization in the U.S. End-use cannot access that parameter.</p> <p>2. Describe, if the device permits third-party software or firmware installation, what mechanisms are provided by the manufacturer to permit integration of such functions while ensuring that the RF parameters of the device cannot be operated outside its authorization for operation in the U.S. In the description include what controls and/or agreements are in place with providers of third-party functionality to ensure the device's underlying RF parameters are unchanged and how the manufacturer verifies the functionality.  Re: It is impossible. All the manufactured products do not support any third party firmware upgrade. Our Company do not cooperate or do not support any third party development company or organization</p> <p>3. For Certified Transmitter modular devices, describe how the module grantee ensures that host manufacturers fully comply with these software security requirements for U-NII devices. If the module is controlled through driver software loaded in the host, describe how the drivers are controlled and managed such that the modular transmitter RF parameters are not modified outside the grant of authorization.  Re: Wifi driver and firmware are embedded in system firmware and there is not any installation process. System firmware is programmed and protected in flash memory. All default parameters are programmed in OTP or in both driver and firmware which would be embedded in system firmware. End-user cannot access them.</p>

## SOFTWARE CONFIGURATION DESCRIPTION GUIDE

In addition to the general security consideration, for devices which have “User Interfaces” (UI) to configure the device in a manner that may impact the operational RF parameters, the following questions shall be answered by the applicant and the information included in the operational description. The description must address if the device supports any of the country code configurations or peer-peer mode communications discussed in KDB 594280 Publication D01.<sup>8</sup>

<b>SOFTWARE CONFIGURATION DESCRIPTION GUIDE</b>	
<b>USER CONFIGURATION GUIDE</b>	<p>1. Describe the user configurations permitted through the UI. If different levels of access are permitted for professional installers, system integrators or end-users, describe the differences.  <b>Re: There is not any UI to access wifi SDR setting.</b></p>
	<p>a) What parameters are viewable and configurable by different parties?  <b>Re: All default parameters are programmed in OTP or in both driver and firmware which would be embedded in system firmware. The system firmware is programmed and protected in flash memory. The professional installer/end-user cannot access the flash memory. End-use only could select which master(AP) to connect.</b></p>
	<p>b) What parameters are accessible or modifiable by the professional installer or system integrators?  <b>Re: There is not any wifi SDR parameter which is accessible or modifiable to the professional installer.</b></p>
	<p>(1) Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?  <b>Re: Yes.</b>                      Some parameters are programmed in OTP and wifi driver and firmware are embedded in system firmware, installer cannot access them. The system firmware is programmed and protected in flash memory. The professional installer/end-user cannot access the flash memory.</p>
	<p>(2) What controls exist that the user cannot operate the device outside its authorization in the U.S.?  <b>Re: There is a country code regulatory parameter to limit user to operate the device outside its authorization in the U.S.</b></p>
	<p>C) What parameters are accessible or modifiable by the end-user?  <b>Re: End-use only could select which master(AP) to connect.</b></p>
	<p>(1) Are the parameters in some way limited, so that the user or installers will not enter parameters that exceed those authorized?  <b>Re: Yes.</b>                      Some parameters are programmed in OTP and wifi driver and firmware are embedded in system firmware, installer cannot access them. The system firmware is programmed and protected in flash memory. The professional installer/end-user cannot access the flash memory.</p>
	<p>(2) What controls exist so that the user cannot operated the device outside its authorization in the U.S.?  <b>Re : There is a country code regulatory parameter to limit product to operate the device outside its authorization in the U.S.</b></p>
	<p>D) Is the country code factory set? Can it be changed in the UI?  <b>Re: No, the country code cannot be changed in UI.</b></p>
	<p>(1) If it can be changed, what controls exist to ensure that the device can only operate within its authorization in the U.S.?  <b>Re : There is a country code regulatory parameter to limit product to operate the device outside its authorization in the U.S.</b></p>
	<p>E) What are the default parameters when the device is restartd?  <b>Re: All default parameters are programmed in OTP or in both driver and firmware which would be embedded in system firmware. The system firmware is programmed and protected in flash memory. The professional installer/end-user cannot access the flash memory.</b></p>
	<p>2. Can the radio be configured in bridge of mesh mode? If yes, an attestation may be required. Further information is available in KDB publication 905462 D02.  <b>Re: Not supported</b></p>
	<p>3. For a device that can be configured as a master and client(with active or passive scanning), if this is user configurable, describe what controls exist, within the UI, to ensure compliance for each mode. If</p>

	<p>the device acts as a master in some bands and client in others, how is this configured to ensure compliance? <a href="#">Re: No. End-use cannot configure the wifi device to be as a master or client.</a></p> <p>4. For a device that can be configured as different types of access points, such as point-to-point or point-to-multipoint, and use different types of antennas, describe what controls exist to ensure compliance with applicable limits and the proper antenna is used for each mode of operation. (See Section 15.407(a)) <a href="#">Re: This product is not an access point.</a></p>
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**Name:** Jason Zhao

**Date:** April 8, 2018

**Title:** Attestation Engineer

**Signature of applicant**

A handwritten signature in black ink that reads "Jason Zhao". The signature is written in a cursive style with a large, stylized 'Z'.