Intuition Robotics 4 Ha-Khilazon St. Ramat-Gan, Israel Tel: +972-52-4761218 Fax:+972-52-4761218

Federal Communication Commission Equipment Authorization Division, Application Processing Branch 7435 Oakland Mills Road Columbia, MD 21046

2018-11-23

Attn: Office of Engineering and Technology Subject: Attestation Letter regarding UNII devices

FCC ID: 2ART9ELQ01

Software security questions and answers per KDB 594280 594280 D02 U-NII Device Security v01r03:

| | Software Security description – General | Description |
|---|--|-----------------------------|
| 1 | Describe how any software/firmware updates for | We do not release the |
| | elements than can affect the device's RF | firmware on our website |
| | parameters will be obtained, downloaded, | for downloading. Our |
| | validated and installed. For software that is | direct host manufacturer |
| | accessed through manufacturer's website or | (OEM) can request the |
| | device's management system, describe the | firmware from us and it |
| | different levels of security as appropriate. | will be made available via |
| | | secure server. |
| 2 | Describe the RF parameters that are modified by | Radio frequency |
| | any software/firmware without any hardware | parameters are limited by |
| | changes. Are these parameters in some way | US regulatory domain and |
| | limited such that any other software/firmware | country code to limit |
| | changes will not allow the device to exceed the | frequency and transmit |
| | authorized RF characteristics? | power levels. These limits |
| | | are stored in non-volatile |
| | | memory by the module |
| | | manufacturer at the time of |
| | | production. They will not |
| | | exceed the authorized |
| | | values. |
| 3 | Describe in detail the authentication protocols | The firmware is installed |
| | that are in place to ensure that the source of the | on each single module |
| | RF-related software/firmware is valid. Describe | during manufacturing |
| | in detail how the RF-related software is protected | process. The correct |
| | against modification. | firmware is verified and |
| | | installed by the module |
| | | manufacturer. |
| | | In addition, the firmware |
| | | binary is encrypted using |

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| | | open SSL encryption and the firmware updates can only be stored in non-volatile memory when the firmware is authenticated. The encryption key is known by the module manufacturer only. |
| 4 | Describe in detail any encryption methods used to support the use of legitimate RF-related software/firmware. | The firmware binary is encrypted. The process to flash a new firmware is using a secret key to decrypt the firmware, only correct decrypted firmware is stored in non-volatile memory (see #3). |
| 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? Software Security description – Third-Party | The device ensures the compliance by checking the configured parameter and operation values according to the regulatory domain and country code in each band. Access Control |
| 1 | Explain if any third parties have the capability to operate a U.Ssold 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. | No, third parties don't have the capability to access and change radio parameters. US sold modules are factory configured to US. |
| 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 devices' underlying RF parameters are unchanged and how the manufacturer verifies the | Unauthorized firmware is not accepted by the firmware update process. See General Description #5, #3 |

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| | functionality. | |
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| 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. | N/A |
| SC | OFTWARE CONFIGURATION DESCRIPTION– U GUID | SER CONFIGURATION |
| 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. | The UI is accessible to anyone using the device. |
| | a. What parameters are viewable and configurable by different parties? | Various device status information is made available like log information, connection status, operation mode, operation frequency, etc. Radio parameters are described in c.i |
| | b. What parameters are accessible or modifiable by the professional installer or system integrators? i. Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized? ii. What controls exist that the user cannot operate the device outside its authorization in the U.S.? | This device is not subject to professional installation |
| | c. What parameters are accessible or modifiable by the end-user? | The end user is able to configure the operation frequency, modulation, reduce the output power levels etc. The end user cannot change the antenna gain and country code, |

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| | | those settings are programmed at factory production time. |
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| | i. Are the parameters in some way limited, so that the user or installers will not enter parameters that exceed those authorized? | Yes, the parameters can only be changed within the limits of country code US. |
| | ii. What controls exist so that the user cannot operate the device outside its authorization in the U.S.? | The country code and regulatory domain control do limit all the parameters set by UI |
| | d. Is the country code factory set? Can it be changed in the UI? | The country code is factory set and is never changed by UI. |
| | i. If it can be changed, what controls exist to ensure that the device can only operate within its authorization in the U.S.? | The country code is factory set and is never changed by UI |
| | e. What are the default parameters when the device is restarted? | At each boot up the country code and the antenna gain are read from the non-volatile memory, those values are configured during module production. |
| 2 | Can the radio be configured in bridge or mesh mode? If yes, an attestation may be required. Further information is available in KDB Publication 905462 D02 | Not supported |
| 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 the device acts as a master in some bands and client in others, how is this configured to ensure compliance? | No end user controls or user interface operation to change master/client operation. |
| 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 | The device does not support these modes/features. |

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| 4 Ha-K | hilazon St. Ramat-Gan, Is | rael | |
| Tel: +9 | 72-52-4761218 Fax:+97 | 72-52-4761218 | |
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| | antennas, describe what | | |
| | | ble limits and the proper | |
| | antenna is used for each | mode of operation. | |
| | (See Section 15.407(a)) | | |
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| Dated | 11-23-2018 | | |
| this | | | |
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| Agend | cy agreement expiration date | e: 11-22-2019 | |
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| By: | n. al. | David Ben Abou | |
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| Teleph | none: +972-52-4761218 | | |
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