PicoCELA Inc

Non-SDR (Software Defined Radio) Cover Letter

Refer to KDB 442812 D01 SDR apps Guide v02r03.

The following six questions can be used for determining if a radio can elect to be, or must be an SDR.

1. Can the RF parameters of the device be altered through software?

Yes - go to 2.

No, not an SDR

Reply: Yes

2. Can third parties not permitted by the Commission through specific filings modify, configure, or load different software, or make configuration settings to operate the device or host hardware radio frequency parameters (frequency range, modulation type, maximum output power or other radio parameters) in any other way than granted (or expected to be granted)?

Yes, must be an SDR.

No - go to 3.

Reply: No

3. Is the device capable of operating in any other in any other way than granted, or will be, granted?

Yes, - go to 4.

No - go to 5.

Reply: No

4. Is this a Part 15 client Device as defined in Section 15.202 (as opposed to a master device)?

Yes, qualifies as a part 15 client devices - go to 5.

No, must be an SDR.

YES

5. Does the manufacturer elect SDR?

Yes, elects to be an SDR.

No, Not an SDR

Reply: No

Final conclusion:

According to the above questions reply, we can confirm this device (**Product Description:** WiFi 6 (802.11ax) 4×4 MU-MIMO Tri Band Access point) must be a Non-SDR.

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Date: 2023-06-12