Ben Botros, Project Manager
Product Safety and Compliance Department

DTS-UNII Device Declaration Letter

October 20, 2017
PASA-17-F003

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road, Columbia MD 21046-1609

Re: Original Certification for FCC ID: ACJ-FG-185-SG32MH
Panasonic Model FG-185-SG32MH, provided with BT, WLAN and UNII Transmitters

To Whom It May Concern:

We declare the following:

(1) DFS Device -- ☐ Master , ☐ Client with Radar detection capability ,
☒ Client without radar detection capability , ☐ N/A

(2) Active / Passive Scanning , adhoc mode access point capability

Frequency Band (MHz)	Active Scanning (the device can transmit a probe (beacon))	passive scanning (where the device is can listen only with no probes)	Ad Hoc Mode or WIFI Direct capability	Access point capability
2412-2472MHz	☒ Yes , ☐ No	☒ Yes , ☐ No	☐ Yes , ☒ No	☐ Yes , ☒ No
5150-5250MHz	☒ Yes , ☐ No	☒ Yes , ☐ No	☐ Yes , ☒ No	☐ Yes , ☒ No
5250-5350MHz	☒ Yes , ☐ No	☒ Yes , ☐ No	☐ Yes , ☒ No	☐ Yes , ☒ No
5470-5725MHz	☒ Yes , ☐ No	☒ Yes , ☐ No	☐ Yes , ☒ No	☐ Yes , ☒ No
5725-5850MHz	☒ Yes , ☐ No	☒ Yes , ☐ No	☐ Yes , ☒ No	☐ Yes , ☒ No

(3) Country code selection ability - ☒ Yes , ☐ No

If yes, pls explain how it was implemented : (pls also help to provide detail of options for each country selection)
The DE block contains a preconfigured country code. This code is checked by Wi-Fi SW and matched in a table to a corresponding ISO country code. This ISO country code is then checked in the TI WLAN regulatory domain file. The Wi-Fi driver configuration file that contains country sets the country code in wpa_supplicant_ti8xx.conf. The Wi-Fi driver is configured with the country specific regulatory setting. If the country code is not found, a default global regulatory settings are chosen.

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(4) Meet 15.202 requirement - ☒ Yes , ☐ No ,
pls check below :
☐A master device is defined as a device operating in a mode in which it has the capability to transmit without receiving an enabling signal. In this mode it is able to select a channel and initiate a network by sending enabling signals to other devices
☒A client device is defined as a device operating in a mode in which the transmissions of the device are under control of the master. A device in client mode is not able to initiate a network.

(5) For client devices that have software configuration control to operate in different modes (active scanning in some and passive scanning in others) in different bands (devices with multiple equipment classes or those that operate on non-DFS frequencies) or modular devices which configure the modes of operations through software, the application must provide software and operations description on how the software and / or hardware is implemented to ensure that proper operations modes can not be modified by end user or an installer.
☒ Apply , ☐ No Apply , (If apply , pls help to provide explanation on it was implement , and how software was controlled)

SYNC scans first using a PASSIVE scan. When SYNC attempts a connection, SYNC does an ACTIVE scan on the channel before sending out a connect request. The SYNC SW does not include a configuration mechanism that allows end user to modify the scanning and/or connection schema.

Thank you for your attention to this matter.

Sincerely,

Ben Botros
Project Manager
Panasonic Corporation of North America
Product Safety & Compliance Department