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August 18, 2017

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

Subject: Class III Permissive Change notice  
FCC ID: PGR2G4360M

To whom it may concern:

This Class III Permissive Change notification is a consequence of an upgradable software enhancement for the 5GHz module used in the Model X5001 gateway to support the UNII-2/DFS bands. These features are described in the operational description addendum included with this submittal.

The original software native versions was identified using a <x.y> format. This was never placed into production.

The new RDK software versions are identified using a format <x>.<y>s<z> where:

- <z> is the "spin" version. The spin version <z> is incremented for each successive code release within a given <x>.<y> series. For example, version "2.10s8" is newer than "2.10s7"
- <y> is the "minor" version. When minor version <y> is incremented, the spin version <z> resets to "1". For example, version "2.11s1" is newer than "2.10s8"
- <x> is the "major" version. When major version <x> is incremented, both minor version <y> the spin version <z> reset to "1". For example, version "3.1s1" is newer than "2.11s3"

The unique RDK-based code version can be inspected via the user-accessible WebUI accessible via the users WAN or LAN connected client devices. The end-user can navigate to the "Software" page and observe field named "Software Image Name". This is a text-string in the format <MODEL>\_<SOFTWARE>\_<FLAVOR> where:

- MODEL denotes the hardware model for which the software is targeted. This is always "PX5001" for the Pace XF3 product.
- SOFTWARE is the software version in format <x>.<y>s<z> as described above.
- FLAVOR denotes whether this is a Development version of the software ("VBN\_sey") or a Production version of the software ("PROD\_sey").

Any radio software changes that affect a future class III permissive change is determined by the specific software change list and thus determine via the software version displayed in the web based graphical user interface as indicated above.

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The Software versions which transition between grants are as follows...

- The initial non-DFS SDR grant was issued on 04/01/16 and released under native code SW Ver. 2.56.
- The new SW version that will be released supporting the UNII-2/DFS bands under this class III permissive change will be released under the RDK code starting at SW Ver. 2.11s4. The end-user will observe this in the UI Software Image Name string as "PX5001\_2.11s4\_Prod\_sey". Typically, end-users will receive only the "PROD\_sey" production build of the software.

\*\* Any versions between those listed above represent bug fixes, system improvements, or customer variants that do not affect the RF characteristics or firmware/software security implementations.

There is no change to the Software, Distribution and Security Documentation (SDS) which was submitted under security descriptions for preventing the alteration of radio parameters under the original SDR approval.

Sincerely,

A handwritten signature in black ink that reads "Mark A. Rieger".

Mark Rieger  
Principal Hardware Engineer  
Regulatory compliance and conformance

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