NETGEAR®

To: Equipment Authorization Division, Federal Communications Commission

Subject: Expedited Review Approval

DUT FCC ID: PY318300418

FCC ID of previously granted DFS Devices: PY316200341

We, the undersigned, NETGEAR Inc., declaim that the device <u>FCC ID: PY318300418</u> with VHT80, has the same performance and function as previously certified DFS tested and approved device <u>FCC ID: PY316200341</u>. The differences are listed as below table:

Required information	Previous Granted DFS Device	New DFS Application
FCC ID	PY316200341	PY318300418
Technology(i.e 802.11x,frame based, MIMO, smart antenna, etc.)	Tri band WiFi, 4x4 11ac 80MHz + 2x2 11ac 80MHz, MU MIMO, Implicit / Explicit Beamforming for 2.4GHz/5GHz bands, 6 high performance internal antennas.	Same as the previous
Bandwidth information and differences	20MHz,40MHz,80MHz,	Same as the previous
Differences in circuitry, software and DFS functioning.	WLAN software version: V1.4.0.34-0112 System Firmware version: V2.0.0.10-DFS-20171026-3	WLAN software version: WLAN.BL.3.3-00092- S-1-1 System Firmware version: V8.2.4.715 All HW circuitry is identical(use the same PCBA), the SW difference is on GUI style (Different product line for market segment).
Differences between the products	Maximum power level: 5250-5350MH:211mW 5470-5725MH:208mW Modulation: 256QAM, 64QAM, 16QAM, QPSK, BPSK for OFDM Antenna Type: Dipole Antenna directional gain: 5.25 GHz- 5.35 GHz: 4.18 dBi 5.47 GHz- 5.720 GHz: 7.43 dBi	Maximum power level: 5250-5350MH: 208.019 mW 5470-5725MH: 203.974 mW Modulation: Same as the previous Antenna Type: Same as the previous Antenna directional gain: 5.25 GHz- 5.35 GHz: 4.18 dBi 5.47 GHz- 5.720 GHz: 7.43 dBi
Names of the test lab for the various Grants	Test Lab: Bureau Veritas CPS (H.K.) Ltd., Taoyuan Branch	Test Lab: Bureau Veritas CPS (H.K.) Ltd., Taoyuan Branch

David Kay/ Regulatory Compliance Director

Netgear Incorporated TEL: 4088903657 FAX: 4089078097

E-mail: david.kay@netgear.com