

NETIS SYSTEMS CO., LTD.

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

Date: July 13,2021

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

FCC ID: T58E3R

Software security questions and answers per KDB 594280 D02:

Software Security description – General Description		
1	Describe how any software/firmware update will be obtained, downloaded, and installed. Software that is accessed through manufacturer's website or device's management system, must describe the different levels of security.	We do not release the firmware on our website for downloading. Our direct host manufacturer (OEM) can request the firmware from us and it will be made available via secure server.
2	Describe in detail the authentication protocols that are in place to ensure that the source of the software/firmware is legitimate. Describe in detail how the software is protected against modification	N/A
3	Describe in detail the verification protocols in place to ensure that installed software/firmware is legitimate	The firmware binary is encrypted. The process to flash anew firmware is using a secret key to decrypt the firmware, only correct decrypted firmware is stored in non-volatile memory (see #3).
4	Describe in detail the verification protocols in place to ensure that installed software/firmware is legitimate	Standard open SSL encryption is used (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?	The device ensures the compliance by checking the configured parameter and operation values according to the regulatory domain and country code in each band. The device configured as Client without radar detection capability
Software Security description – Third-Party Access Control		

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1	Explain if any third parties have the capability to operate a US sold device on any other regulatory domain, frequencies, or in any manner that is in violation of the certification.	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 functionality.	The embedded software is protected via the measures explained in the previous section. Distributions of host operating software are encrypted with a key.
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
Software Security description – USER CONFIGURATION GUID		
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.	There is no user configuration GUI.
	a. What parameters are viewable and configurable by different parties?	There is no user configuration GUI.
	b. What parameters are accessible or modifiable to the professional installer? 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 configuration options are available to	The end user is not able to

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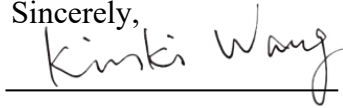
	<p>the end-user?</p> <p>i. Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?</p> <p>ii. What controls exist that the user cannot operate the device outside its authorization in the U.S.?</p>	<p>configure any parameters related to the devices radio</p> <p>The parameters can only be changed remotely within the limits of country code US.</p> <p>The country code and regulatory domain control do limit all the parameters set</p>
	<p>d. Is the country code factory set? Can it be changed in the UI?</p> <p>i. If so, what controls exist to ensure that the device can only operate within its authorization in the U.S.?</p>	<p>The country code is factory set and is never changed by UI.</p> <p>The country code is factory set and is never changed by UI</p>
	<p>e. What are the default parameters when the device is restarted?</p>	<p>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.</p>
2	<p>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.</p>	<p>Not supported</p>
3	<p>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 foreach mode. If the device acts as a master in some bands and client in others, how is this configured to ensure compliance?</p>	<p>Not Supported</p>
4	<p>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 antennas, describe what controls exist to ensure compliance with applicable limits and the proper antenna is used for each mode of operation. See Section 15.407(a).</p>	<p>The device does not support these modes/features.</p>

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Sincerely,



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