Federal Communication Commission Equipment Authorization Division, Application Processing Branch 7435 Oakland Mills Road Columbia, MD21048

Date: <2020-02-24>

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

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Software security questions and answers per KDB 594280 D02:

	Software Security description – General Description				
1	Describe how any software/firmware updates for	The RF parameters are put in the			
	elements than can affect the device's RF	read-only partition of device's flash			
	parameters will be obtained, downloaded,	and could only be installed by the			
	validated and installed. For software that is	factory. The software is compiled as			
	accessed through manufacturer's website or	binary file and cannot change the			
	device's management system, describe the	RF parameter through this binary			
	different levels of security as appropriate.	file. It is read-only without the			
		change to change the setting.			
2	Describe the RF parameters that are modified by	Radio frequency parameters are			
	any software/firmware without any hardware	limited by US regulatory domain			
	changes. Are these parameters in some way	and country code to limit frequency			
	limited such that any other software/firmware	and transmit power levels. These			
	changes will not allow the device to exceed the	limits are stored in non-volatile			
	authorized RF characteristics?	memory by the module			
		manufacturer at the time of			
		production. They will not exceed			
		the authorized values.			
3	Describe in detail the authentication protocols	The firmware is installed on each			
	that are in place to ensure that the source of the	single module during			
	RF-related software/firmware is valid. Describe	manufacturing process. The correct			
	in detail how the RF-related software is protected	firmware is verified and installed by			
	against modification.	the module manufacturer.			
		In addition, the firmware binary is			
		encrypted using open SSL			
		encryption and the firmware			
		updates can only be stored in			

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		non-volatile memory when the					
		firmware is authenticated.					
		The encryption key is known by the					
		module manufacturer only.					
4	Describe in detail any encryption methods used	The firmware binary is encrypted.					
	to support the use of legitimate RF-related	The process to flash anew firmware					
	software/firmware.	is using a secret key to decrypt the					
		firmware; only correct decrypted					
		firmware is stored in non-volatile					
		memory (see #3).					
5	For a device that can be configured as a master	The device ensures the compliance					
	and client (with active or passive scanning),	by checking the configured					
	explain how the device ensures compliance for	parameter and operation values					
	each mode? In particular if the device acts as	according to the regulatory domain					
	master in some band of operation and client in	and country code in each band.					
	another; how is compliance ensured in each band						
	of operation?						
	Software Security description – Third-Party Access Control						
1	Explain if any third parties have the capability to	No, third parties don't have the					
	operate a US sold device on any other regulatory	capability to access and change					
	domain, frequencies, or in any manner that is in	radio parameters. US sold modules					
	violation of thecertification.	are factory configured to US.					
2	Describe, if the device permits third-party	The RF parameters are put in the					
	software or firmware installation, what	read-only partition of device's flash					
	mechanisms are provided by the manufacturer to	and could only be installed by the					
	permit integration of such functions while	factory. RF parameters: frequency					
	ensuring that the RF parameters of the device	operation, power settings and					
	cannot be operated outside its authorization for	country code.					
	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.						
3	For Certified Transmitter modular devices,	The module is not available for sale					
	describe how the module grantee ensures that	or installation outside of company					
	host manufacturers fully comply with these	licensing agreements. Modules are					
	software security requirements for U-NII devices.	always installed in host systems in a					
	If the module is controlled through driver	factory by end integrators (OEM)					
	software loaded in the host, describe how the	responsible for loading authorized					
	drivers are controlled and managed such that the	software.					
	modular transmitter RF parameters are not						
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	modifie	ed outside the grant of authorization.				
	Software Security description – USER CONFIGURATION GUID					
1	through permitt	be the user configurations permitted the UI. If different levels of access are ted for professional installers, system	Authorized channel, bandwidth, and modulation can be configured through the UI.			
		tors or end-users, describe the differences.				
		hat parameters are viewable and afigurable by different parties?	Various device status information is made available like log information, connection status, operation mode, operation frequency, etc. Radio parameters are described in c.i			
	b. Wh	nat parameters are accessible or modifiable	This device is not subject to			
		Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?	professional installation			
	ii.	What controls exist that the user cannot operate device outside its authorization in the U.S.?				
		nat configuration options are available to end-user?	The end user is able to configure the operation frequency, modulation, reduce the output power levels etc. The end user			
	i.	Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?	cannot change the antenna gain and country code, those settings are programmed at factory production time.			
	ii.	What controls exist that the user cannot operate device outside its authorization in the U.S.?	Yes, the parameters can only be changed within the limits of country code US.			
			The country code and regulatory domain control do limit all the parameters set by UI			
		he country code factory set? Can it changed in the UI?	The country code is factory set and is never changed by UI.			
			The country code is factory set and			

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	i. If so, what controls exist to ensure	is never changed by UI					
	that thedevice can only operate within						
	its authorizationin the U.S.?						
	e. What are the default parameters when	RF parameters including frequency					
	thedevice is restarted?	operation, power settings and					
		country code are the default factory					
		settings when the device is					
		restarted.					
2	Can the radio be configured in bridge or	Not supported.					
	meshmode? If yes, an attestation may be						
	required.Further information is available in						
	KDBPublication 905462 D02.						
3	For a device that can be configured as a	No end user controls or user					
	masterand client (with active or passive	interface operation to change					
	scanning), if this is user configurable, describe	master/client operation.					
	what controlsexist, within the UI, to ensure						
	compliance foreach mode. If the device acts as a						
	master insome bands and client in others, how is						
	thisconfigured to ensure compliance?						
4	For a device that can be configured as	The device does not support these					
	differenttypes of access points, such as	modes/features.					
	point-to-point orpoint-to-multipoint, and use						
	different types of antennas, describe what controls						
	exist to ensurecompliance with applicable limits						
	and the properantenna is used for each mode of						
	operation.See Section 15.407(a).						