

Date: March 13, 2024

**Federal Communications Commission
Authorization and Evaluation Division**

7435 Oakland Mills Rd
Columbia MD 21046-1609

Subject: Letter of Declaration on WiFi 6E Operation

To whom it may concern:

We, Arista Networks, Inc., attest that this device under FCC ID **TOR-C460** complies with device protocol requirements and operational restrictions:

For Low-power indoor access points (6ID):

a.) Device Protocol Attestation Statement:

- a. An IEEE 802.11ax Access Point's Transmit Power Envelope element has information fields for power limits for connecting client/subordinate devices. The TPE information is contained in this device signals and used by connecting client/subordinate to ensure that it knows the regulatory TX powers it is allowed to transmit at. There is a regulatory info field in this device beacon and probe response frames which details this device type when the client/subordinate associates to this device.

b.) The statement acknowledging device restrictions:

- a. This AP is power from a wired connection, has an integrated antenna, is not battery powered, and does not have a weatherized enclosure.
- b. This device's operation will not be allowed on oil platforms, cars, trains, boats, and aircraft, except that operation of this device is permitted in large aircraft while flying above 10,000 feet only in the 5.925-6.425 GHz band.
- c. This device is prohibited for control of or communications with unmanned aircraft systems, including drones.

For Indoor Subordinate (6PP):

1. Device Protocol Attestation Statement:

- a. this device will always be under the control of a low-power indoor AP and will only initiate brief messages to be under the control of an indoor low-power AP. These brief messages will only occur if the subordinate has detected a low-power indoor AP operating on a channel. These brief messages will have a time-out mechanism such that if it does not receive a response from an AP it will not continually repeat the request.
- b. once under control of an indoor access point, a subordinate will initiate connections with clients, other access points, or other subordinate devices at a lower power or equal to the power advertised by the access point controlling the subordinate and never above the maximum output power allowed by the FCC grant for equipment class 6PP.
- c. An IEEE 802.11ax Access Point's Transmit Power Envelope element has information fields for power limits for connecting client/subordinate devices. The TPE information is contained in this device signals and used by connecting client/subordinate to ensure that it knows the

regulatory TX powers it is allowed to transmit at. There is a regulatory info field in this device beacon and probe response frames which details this device type when the client/subordinate associates to this device.

2. The statement acknowledging device restrictions:

- a. This device operates in the 5.925-7.125 GHz band. It is supplied power from a wired connection, has an integrated antenna, is not battery-powered, and does not have a weatherized enclosure.
- b. The installation guide will include the operation of this device will not be allowed on oil platforms, cars, trains, boats, and aircraft, except that this device's operation is permitted in large aircraft while flying above 10,000 feet.
- c. This device will not be used for control of or communications with unmanned aircraft systems, including drones.
- d. This device has no direct connection to the internet.
When configured for subordinate mode, this device has no direct connection to the internet. WAN port function is disabled and automatically software configured to operate as a LAN port only. his process does not require user intervention nor user configurable.

For 6 GHz Low Power Indoor Client (6XD):

1. Device Protocol Attestation Statement:

- a. This device will only associate and connect with a low-power indoor access point or subordinate device and never directly connect to other client devices.
- b. This device will always initiate transmission under the control of a low-power indoor AP or subordinate except for brief transmissions before joining a network. These short messages will only occur if the client has detected an indoor AP or subordinate operating on a channel. These brief messages will have a time-out mechanism such that if it does not receive a response from an AP it will not continually repeat the request.
- c. Transmissions will be lower or equal to the power advertised by the indoor low-power access point or subordinate and never above the maximum output power allowed by the FCC grant for equipment class 6XD.


2. Understanding of Statement acknowledging device restrictions:

- a. This device is prohibited for control of or communications with unmanned aircraft systems, including drones.

Sincerely,

Applicant : Arista Networks, Inc.

Address : 5453 Great America Parkway, Santa Clara, CA 95054, United States

Signature : 

Name and Job Title : Fernando Solorzano, Manager, EMC design, Product Safety & Certification

E-mail : fnsolorzano@arista.com

Tel. : 1 (408) 547 5500