Pegatron Corporation

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Federal Communications Commission
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c.c.
Compliance Certification Services
Certification Division
47173 Benicia Street
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Channel 12/13 Difference

To whom it may concern,
We, PEGATRON CORPORATION hereby declare that the CH12 & 13 of 802.11bgn of our Device (FCC ID: VUI-THOR3160) is meet the KDB 594280 D01 requirement. All the power settings and RF parameters (including CH12/13 passive scan) are programmed into module's NVM and won't be modified by SW or drivers.
The device adopt Intel 3160NGW WLAN (FCC ID: PD93160NGU) and its detailed operation of channels 12-13 in US is as below :

Please be advised that the Model 3160NGW 802.11a/b/g/n/ac + BT Wireless LAN mini-PCIe card is manufactured as a module for the global market but when marketed in the U.S. under FCC ID's PD93160NG and PD93160NGU the non-volatile memory (NVM) will be programmed at the factory to only actively scan and operate on these specific channels during normal WLAN operation. During Wi-Fi Direct mode the device may act as a group owner (GO) to establish a peer-to-peer (P2P) network including conditions when no master device is present on these specific channels.

Channels 1-11, 2412-2462MHz 802.11b mode
Channels 1-11, 2412-2462MHz 802.11g mode
Channels 1-11, 2412-2462MHz 802.11n mode (20MHz channel)
Channels 3-9, 2422-2452MHz 802.11n mode (40MHz channel)

The device operates as a client without radar detection capability and will be programmed at the factory to passively scan on the following dynamic frequency selection (DFS) channels and will only listen for a master device and cannot send a probe request to initiate communication on these DFS channels. Accordingly passive scanning provides protection for TDWR operations and preventing transmission in the 5600MHz – 5650MHz frequency band. Client software and drivers will never enable the device to act as a master or GO for operation in DFS frequency bands and therefore ad-hoc mode is always disabled on these passive scan DFS channels.

Channels 52-64, 5260-5320MHz 802.11a mode
Channels 52-64, 5260-5320MHz 802.11n mode (20 MHz channel)
Channels 52-64, 5260-5320MHz 802.11ac mode (20 MHz channel)
Channels 54-62, 5270-5310MHz 802.11n mode (40MHz channel)
Channels 54-62, 5270-5310MHz 802.11ac mode (40MHz channel)
Channel 58, 5290MHz 802.11ac mode (80MHz channel)
Channels 100-140, 5500-5700MHz 802.11a mode
Channels 100-140, 5500-5700MHz 802.11n mode (20 MHz channel)

Channels 12 &13, 2467 & 2472MHz 802.11b mode
Channels 12 &13, 2467 & 2472MHz 802.11g mode
Channels 12 &13, 2467 & 2472MHz 802.11n mode (20MHz channel)
Channels 10 &11, 2457 & 2462MHz 802.11n mode (40MHz channel)
Channels 36-48, 5180-5240MHz 802.11a mode
Channels 36-48, 5180-5240MHz 802.11n mode (20 MHz channel)
Channels 36-48, 5180-5240MHz 802.11ac mode (20 MHz channel)
Channels 38-46, 5190-5230MHz 802.11n mode (40MHz channel)
Channels 38-46, 5190-5230MHz 802.11ac mode (40MHz channel)
Channel 42, 5210MHz 802.11ac mode (80MHz channel)
Channels 149-165, 5745-5825MHz 802.11a mode
Channels 149-165, 5745-5825MHz 802.11n mode (20 MHz channel)
Channels 149-165, 5745-5825MHz 802.11ac mode (20 MHz channel)
Channels151-159, 5755-5795MHz 802.11n mode (40MHz channel)
Channels151-159, 5755-5795MHz 802.11ac mode (40MHz channel)
Channel 155, 5775MHz 802.11ac mode (80MHz channel)

This information when programmed into the NVM will not be accessible and cannot be changed by the end user. The transmitter is approved as a non-software defined radio and OEMs and third party system integrators do not have the ability through software to modify configuration controls that would permit the device to operate outside the grant conditions per FCC KDB 594280.

Any questions regarding this declaration, please don't hesitate to contact us.
Sincerely yours,

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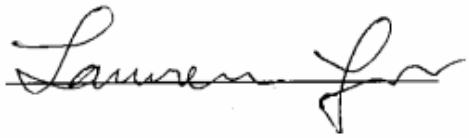

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