Federal Communication Commission
Equipment Authorization Division, Application Processing Branch
7435 Oakland Mills Road
Columbia, MD 21048

May 13, 2016

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

FCC ID: VW7SR555A
Software security questions and answers per KDB 594280 D02:

Software Security description – General Description		
1	Describe how any software/firmware updates for elements than can affect the device's RF parameters will be obtained, downloaded, validated and installed. For software that is accessed through manufacturer's website or device's management system, describe the different levels of security as appropriate.	We do not release the firmware on our website for downloading. Our direct host manufacturer (OEM) and Service Provider customers (not end-users) can request the firmware from us and it will be made available via secure server.
2	Describe the RF parameters that are modified by any software/firmware without any hardware changes. Are these parameters in some way limited such that any other software/firmware changes will not allow the device to exceed the authorized RF characteristics?	Radio frequency parameters are limited by US regulatory domain and country code to limit frequency and transmit power levels. These limits are stored in non-volatile memory by the manufacturer at the time of production. They will not exceed the authorized values.
3	Describe in detail the authentication protocols that are in place to ensure that the source of the RF-related software/firmware is valid. Describe in detail how the RF-related software is protected against modification.	The firmware is installed on each product during the manufacturing process. The correct firmware is verified and installed by the manufacturer. In addition, the firmware updates can only be stored in non-volatile memory when the firmware is authenticated. This prevents modification of RF-related software as well as installation of unauthorized firmware.
4	Describe in detail any encryption methods used to support the use of legitimate RF-related software/firmware.	Only firmware with a special signature can be programmed to the non-volatile memory.

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 default mode is master. Client mode can only be enabled by running special commands within CLI via test mode. So technically only master is supported.
	Software Security description – Third-Party Access Control	
1	Explain if any third parties have the capability to operate a U.S.-sold device on any other regulatory domain, frequencies, or in any manner that may allow the device to operate in violation of the device's authorization if activated in the U.S.	Third parties don't have the capability to access and change radio parameters. US-sold products are factory configured to US. Unauthorized firmware is not accepted by the firmware update process.
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.	Third-party software or firmware installation is not permitted.
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.	Device is not a modular device.
	Software Security description – SOFTWARE CONFIGURATION DESCRIPTION	
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.	The user configurations permitted through the UI are limited to basic WiFi configuration and security settings (SSID, encryption, passphrase). There are 3 levels of access, none of which provide access to radio parameters.

	a.	What parameters are viewable and configurable 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.	What parameters are accessible or modifiable to the professional installer or system integrators? 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 accessible or modifiable by the end-user? 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.?	The end user is able to configure the operation frequency, modulation, reduce the output power levels, etc. The end user cannot change the antenna gain, nor increase the Tx power beyond the max set at manufacturer - those settings are programmed at factory production time. The parameters can only be changed within the limits of country code US. The country code and regulatory domain control limit all the parameters set by UI.
	d.	Is the country code factory set? Can it be changed in the UI? i. If so, what controls exist to ensure that the device can only operate within its authorization in the U.S.?	The country code is factory set and is never changed by UI.
	e.	What are the default parameters when the device is restarted?	At each boot up the country code and the antenna gain are read from the non-volatile memory, those values are configured during production.
2	Can the radio be configured in bridge or mesh mode? If yes, an attestation may be required. Further		Not supported

	information is available in KDB Publication 905462 D02.	
3	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 for each mode. If the device acts as a master in some bands and client in others, how is this configured to ensure compliance?	No end user controls or user interface operation to change master/client operation.
4	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).	The device does not support these modes/features.

Sincerely,

DAVID LA CAGNINA
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