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

<2016-07-01>

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

FCC ID: XPF-REG07-UTT

Software security questions and answers per KDB 594280 D02:

	Software Security description General Description				
1	Software Security description – General Description				
1	Describe how any software/firmware update will	We do not release the firmware on			
	be obtained, downloaded, and installed. Software	our website for downloading. Our			
	that is accessed through manufacturer's website	direct host manufacturer (OEM) can			
	or device's management system, must describe	request the firmware from us and it			
	the different levels of security.	will be made available via secure			
		server.			
2	Describe all the radio frequency parameters that	Radio frequency parameters are			
	are modified by any software/firmware without	limited by US regulatory domain			
	any hardware changes. Are these parameters in	and country code to limit frequency			
	some way limited, such that, it will not exceed	and transmit power levels. These			
	the authorized parameters?	limits are stored in non-volatile			
		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			
	software/firmware is legitimate. Describe in	manufacturing process. The correct			
	detail how the software is protected against	firmware is verified and installed by			
	modification	the module manufacturer.			
		In addition, the firmware binary is			
		encrypted using open SSL			
		encryption and the firmware			
		updates can only be stored in			
		non-volatile memory when the			
		firmware is authenticated.			
		The encryption key is known by the			

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		module manufacturer only.
4	Describe in detail the verification protocols in	The firmware binary is encrypted.
	place to ensure that installed software/firmware is	The process to flash a new firmware
	legitimate	is using a secret key to decrypt the
		firmware, only correct decrypted
		firmware is stored in non-volatile
		memory (see #3).
5	Describe in detail the verification protocols in	Standard open SSL encryption is
	place to ensure that installed software/firmware is	used (see #3).
	legitimate	
6	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
	-	and country code in each band.
	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?	
1	Software Security description – Third-P	
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 the certification.	are factory configured to US.
2	Describe, if the device permits third-party	The embedded software is protected
	software or firmware installation, what	via the measures explained in the
	mechanisms are provided by the manufacturer to	previous section. Distributions of
	permit integration of such functions while	host operating software are
	ensuring that the RF parameters of the device	encrypted with a key.
	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.	
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	
	modified outside the grant of authorization.	
	institution satisfies the Brain of additionization.	

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	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?	The end user is not able to configure any parameters related to the devices radio			
	i. Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?	The parameters can only be changed remotely within the limits of country code US.			
	ii. What controls exist that the user cannot operate the device outside its authorization in the U.S.?	The country code and regulatory domain control do limit all the parameters set			
	d. Is the country code factory set? Can it be changed in the UI?	The country code is factory set and is never changed by 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 module production.			
2	Can the radio be configured in bridge or mesh mode? If yes, an attestation may be required. Further information is available in KDB	Not supported			

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3	For a device that can be configured as a master	No end user controls or user
	and client (with active or passive scanning), if	interface operation to change
	this is user configurable, describe what controls	master/client operation.
	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?	
4	For a device that can be configured as different	The device does not support these
	types of access points, such as point-to-point or	modes/features.
	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).	

Sincerely

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(signature)

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