

GE Inspection Technologies, LP 721 Visions Drive Skaneateles, NY 13152

June 7, 2016

Federal Communications Commission 7435 Oakland Mills Road Columbia MD 21046

Subject: Attestation of Software Security Letter Equivalency

FCC ID: 2AB5I-7260H

To Whom It May Concern:

I hereby attest that the software security letter provided by GE Inspection Technologies, LP for FCC ID: 2AB5I-7260H was provided by Intel Corp and is equivalent to Intel FCC ID: PD97260H.

Best Regards,

Daniel A. Coogan
Product Compliance Manager
GE Inspection Technologies

721 Visions Dr

Skaneateles, NY 13152

Software Security Description – KDB 594280 D02v01r02 Section II

General Description

1. Describe how any software/firmware update will be	There is no downloadable software provided by the
obtained, downloaded, and installed. Software that is	manufacturer that can modify critical radio transmitter
accessed through manufacturer's website or device's	parameters. All critical parameters are programmed in
management system, must describe the different levels	OTP memory at the factory and cannot be modified or
of security.	overridden by third parties.
,	
2. Describe all the radio frequency parameters that are	There are no rf parameters that can be modified. All rf
modified by any software/firmware without any	parameters are programmed in OTP memory at the
hardware changes. Are these parameters in some way	factory and cannot be modified or overridden by third
limited, such that, it will not exceed the authorized	parties.
parameters?	
3. Describe in detail the authentication protocols that	The firmware is programmed at the factory and cannot
are in place to ensure that the source of the	be modified by third parties.
software/firmware is legitimate. Describe in detail how	
the software is protected against modification.	
4. Describe in detail the verification protocols in place	The firmware is programmed at the factory and cannot
to ensure that installed software/firmware is legitimate.	be modified by third parties.
Describe in detail any encryption methods used to	The firmware is programmed at the factory and cannot
support the use of legitimate software/firmware.	be modified by third parties therefore no encryption is
	necessary.
Corp device that can be configured as a master and	This is a client module only
6. For a device that can be configured as a master and	This is a client module only.
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?	

Third-Party Access Control

1. Explain if any third parties have the capability to operate a US sold device on any other regulatory domain, frequencies, or in any manner that is in violation of the certification.	Third parties do not the capability to operate in any manner that is violation of the certification in the U.S.
2. What prevents third parties from loading non-US versions of the software/firmware on the device? Describe in detail how the device is protected from "flashing" and the installation of third-party firmware such as DD-WRT. (See, for example, http://www.dd-	RF parameters are programmed into OTP memory at the factory and cannot be reprogrammed or re-flashed by third parties.

wrt.com/)	
3. For Certified Transmitter modular devices, describe how the module grantee ensures that hosts manufactures fully comply with these software security requirements for U-NII devices. If the module is	There are no rf parameters that can be modified. All rf parameters are programmed in OTP memory at the factory and cannot be modified or overridden by third parties. The module is not controlled by driver software on the host and cannot override critical rf parameters stored in module OTP memory.

SOFTWARE CONFIGURATION DESCRIPTION - KDB 594280 D02v01r02 Section III

USER CONFIGURATION GUIDE

1. To whom is the UI accessible? (Professional installer,	No UI provided.
end user, other.)	
a) What parameters are viewable to the professional installer/end-user?	None
b) What parameters are accessible or modifiable to the professional installer?	None
i) Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?	The module micro-code reads the parameters from the module OTP memory. These parameters cannot be modified or overridden by sw drivers.
ii) What controls exist that the user cannot operate the device outside its authorization in the U.S.?	Default mode is always FCC compliant. Other country modes cannot be activated without receiving three independent country codes from different APs, otherwise remains in FCC default mode (always FCC compliant)
c) What configuration options are available to the end-user?	None
i) Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?	The module micro-code reads the parameters from the module OTP memory. These parameters cannot be modified or overridden by sw drivers.
ii) What controls exist that the user cannot operate the device outside its authorization in the U.S.?	Default mode is always FCC compliant. Other country modes cannot be activated without receiving three independent country codes from different APs, otherwise remains in FCC default mode (always FCC compliant)
d) Is the country code factory set? Can it be changed in the UI?	Default country code is set in the factory and no UI is provided for modification.
i) If so, what controls exist to ensure that the device can only operate within its authorization in the	Programmed for default mode which is always FCC compliant. Always set for default for all start-ups, resets, timeouts or other host or network events.

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U.S.?	
e) What are the default parameters when the device	Always FCC compliant
is restarted?	
2. Can the radio be configured in bridge or mesh mode?	No
If yes, an attestation may be required. Further	
information is available in KDB Publication 905462 D02.	
3. For a device that can be configured as a master and	This is a client device.
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?	
4. For a device that can be configured as different types	This device is not an access point.
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))	

Name and surname of applicant (or <u>authorized</u> representative):

Date: May 11, 2015 Signature: