Federal Communication Commission Equipment Authorization Division, Application Processing Branch 7435 Oakland Mills Road Columbia, MD 21046

<2017-04-18>

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

FCC ID: 2AKIQ-AEC120

Software security questions and answers per KDB 594280 D02:

201111	Software security questions and answers per KDB 394280 D02:					
	Software Security description – General Description					
1	Describe how any software/firmware update will	We do not release the				
	be obtained, downloaded, and installed. Software	firmware on our website				
	that is accessed through manufacturer's website	for downloading. Our				
	or device's management system, must describe	direct host manufacturer				
	the different levels of security.	(OEM) can request the				
		firmware from us and it				
		will be made available via				
		secure server.				
2	Describe all the radio frequency parameters that	Radio frequency				
	are modified by any software/firmware without	parameters are limited by				
	any hardware changes. Are these parameters in	US regulatory domain and				
	some way limited, such that, it will not exceed	country code to limit				
	the authorized parameters?	frequency and transmit				
		power levels. These 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				
	that are in place to ensure that the source of the	on each single module				
	software/firmware is legitimate. Describe in	during manufacturing				
	detail how the software is protected against	process. The correct				
	modification	firmware is verified and				
		installed by the module				
		manufacturer.				
		In addition, the firmware				
		binary is encrypted using				

Axilspot Communication Co., Ltd.

A302 Han's Innovation Building ,No.9018 beihuan Ave, Nanshan District,Shenzhen, China

		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 module manufacturer only.	
4	Describe in detail the verification protocols in place to ensure that installed software/firmware is legitimate	The firmware binary is encrypted. The process to flash a new firmware 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 place to ensure that installed software/firmware is legitimate	Standard open SSL encryption is used (see #3).	
6	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? Software Security description – Third-Party	The device ensures the compliance by checking the configured parameter and operation values according to the regulatory domain and country code in each band.	
1	How is unauthorized software/firmware changes prevented?	Unauthorized firmware is not accepted by the firmware update process. See General Description #5, #3	
2	Is it possible for third parties to load device drivers that could modify the RF parameters, country of operation or other parameters which impact device compliance? If so, describe procedures to ensure that only approved drivers are loaded.	The embedded software is protected via the measures explained in the previous section. Distributions of host operating software are encrypted with a key.	
3	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.	No, third parties don't have the capability to access and change radio parameters. US sold modules are factory	

Axilspot Communication Co., Ltd.

A302 Han's Innovation Building ,No.9018 beihuan Ave, Nanshan District,Shenzhen, China

		configured to US.				
4	What prevents third parties from loading non -US	Only encrypted and				
	versions of the software/firmware on the device?	verified firmware is				
		applied and stored in the				
		non-volatile memory.				
5	For modular devices, describe how authentication	The module is not				
	is achieved when used with different hosts.	available for sale or				
		installation outside of				
		company licensing				
		agreements. Modules are				
		always installed in host				
		systems in a factory by end				
		integrators (OEM)				
		responsible for loading				
		authorized software.				
	Software Security description – USER CONFIGURATION GUID					
1	To whom is the UI accessible? (Professional	The UI is accessible to				
	installer, end user, other.)	anyone using the device.				
	a. What parameters are viewable to the	Various device status				
	professional installer/end user?	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	This device is not subject				
	to the professional installer?	to professional installation				
	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.?					
	c. What configuration options are available to	The end user is able to				
	the end-user?	configure the operation				
		frequency, modulation,				
		reduce the output power				
		levels etc. The end user				
		cannot change the antenna				
		gain and country code,				
		those settings are				
		programmed at factory				

Axilspot Communication Co., Ltd.

A302 Han's Innovation Building ,No.9018 beihuan Ave, Nanshan District,Shenzhen, China

			production time.
	i.	Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?	Yes, the parameters can only be changed 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 by UI
	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
		are the default parameters when the e 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 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

(signature) Figo Fu

Company: Axilspot Communication Co., Ltd.

Contact Person: Figo fu

Title: CTO

Telephone: +86-755-29518999 Email:Figo.fu@axilspote.com