NETGEAR®

To: Equipment Authorization Division, Federal Communications Commission

Subject: Expedited Review Approval

DUT FCC ID: PY318300427

FCC ID of previously granted DFS Devices: PY316200341

We, the undersigned, NETGEAR Inc., declaim that the device <u>FCC ID: PY318300427</u> with VHT80, has the same performance and function as previously certified DFS tested and approved device <u>FCC ID: PY316200341</u>. The differences are listed as below table:

Required information	Previous Granted DFS Device	New DFS Application
FCC ID	PY316200341	PY318300427
Technology(i.e 802.11x,frame based, MIMO, smart antenna, etc.)	Tri band WiFi, 4x4 11ac 80MHz + 2x2 11ac 80MHz, MU MIMO, Implict / Explicit Beamforming for 2.4GHz/5GHz bands, 6 high performance internal antennas.	Same as the previous
Bandwidth information and differences	20MHz,40MHz,80MHz,	Same as the previous
Differences in circuitry, software and DFS functioning.	WLAN software version: V1.4.0.34-0112 System Firmware version: V2.0.0.10-DFS-20171026-3	WAC540: WLAN software version: WLAN.BL.3.3- 00092-S-1-1 System Firmware version: V8.2.4.715 SRC60: WLAN software version: WLAN.BL.3.4.c2- 00014-S-1 System Firmware version: V2.3.5.108 The main chipset and RF circuitry are identical, the SW difference is on GUI style (Different product line for market segment).
Differences between the products	Maximum power level: 5250-5350MH:210.708mW 5470-5725MH:207.879mW Modulation: OFDM,OFDMA, and DSSSS Antenna Type: external dipole antenna Antenna directional gain: 5.25 GHz- 5.35 GHz: 4.18 dBi 5.47 GHz- 5.720 GHz: 7.43 dBi	Maximum power level: 5250-5350MH:210.167mW 5470-5725MH:215.548mW Modulation: Same as the previous Antenna Type: Same as the previous Antenna directional gain: 5.25 GHz- 5.35 GHz: 4.15 dBi 5.47 GHz- 5.720 GHz: 7.04 dBi
Names of the test lab for the various Grants	Test Lab: Bureau Veritas CPS (H.K.) Ltd., Taoyuan Branch	Test Lab: Bureau Veritas CPS (H.K.) Ltd., Taoyuan Branch

David Kay/ Regulatory Compliance Director

Netgear Incorporated TEL: 4088903657 FAX: 4089078097

E-mail: david.kay@netgear.com

Dard Kay