BLUEBIRD INC.
(Dogok-dong, SEI Tower 13,14) 39, Eonjuro30-gil, Gangnam-gu, Seoul, Korea
Tel. +82-70-7730-8210
Fax +82-2-548-0870

March 26, 2015

Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Model 7265NGW Wireless LAN mini-PCIe Card
FCC ID: SS4ET100 (Module FCC ID: PD97265NG)

Gentlemen:

Please be advised that the Model 7265NGW 802.11a/b/g/n/ac + BT Wireless LAN mini-PCIe card is manufactured for the global market but when marketed in the U.S. under FCC IDs PD97265NG & PD97265NGU. The nonvolatile memory (NVM) will be programmed at the factory to only actively scan and operate on these specific channels during normal WLAN operation. During Wi-Fi Direct mode the device may act as a group owner (GO) to establish a peer-to-peer (P2P) network including conditions when no master device is present on these specific channels.

Channels 1-11, 2412-2462MHz 802.11b mode
Channels 1-11, 2412-2462MHz 802.11g mode
Channels 1-11, 2412-2462MHz 802.11n mode (20MHz channel)
Channels 3-9, 2422-2452MHz 802.11n mode (40MHz channel)

The device operates as a client without radar detection capability and will be programmed at the factory to passively scan on the following dynamic frequency selection (DFS) channels and will only listen for a master device and cannot send a probe request to initiate communication on these DFS channels. Accordingly passive scanning provides protection for TDWR operations and preventing transmission in the 5600MHz – 5650MHz frequency band. Client software and drivers will never enable the device to act as a master or GO for operation in DFS frequency bands and therefore ad-hoc mode is always disabled on these passive scan DFS channels.

Channels 52-64, 5260-5320MHz 802.11a mode
Channels 52-64, 5260-5320MHz 802.11n mode (20 MHz channel)
Channels 52-64, 5260-5320MHz 802.11ac mode (20 MHz channel)
Channels 54-62, 5270-5310MHz 802.11n mode (40MHz channel)
Channels 54-62, 5270-5310MHz 802.11ac mode (40MHz channel)
Channel 58, 5290MHz 802.11ac mode (80MHz channel)
Channels 100-140, 5500-5700MHz 802.11a mode
Channels 100-140, 5500-5700MHz 802.11n mode (20 MHz channel)

Channels 100-144, 5500-5720MHz 802.11ac mode (20 MHz channel)
Channels 102-134, 5510-5670MHz 802.11n mode (40MHz channel)
Channels 102-142, 5510-5710MHz 802.11ac mode (40MHz channel)
Channels 106 &138, 5540 & 5690MHz 802.11ac mode (80MHz channel)

This device meets the requirements of FCC Part 15.202 and accordingly will be programmed at the factory to passively scan on the following non-DFS channels and will only listen for a master device and cannot send a probe request to initiate communication during normal WLAN operation. When operating in Wi-Fi Direct mode on these non-DFS channels, it may operate as a P2P client device or GO to establish a P2P network if, and only if, a master device is present and network communication is maintained between a master device and the GO.

Channels 36-48, 5180-5240MHz 802.11a mode
Channels 36-48, 5180-5240MHz 802.11n mode (20 MHz channel)
Channels 36-48, 5180-5240MHz 802.11ac mode (20 MHz channel)
Channels 38-46, 5190-5230MHz 802.11n mode (40MHz channel)
Channels 38-46, 5190-5230MHz 802.11ac mode (40MHz channel)
Channel 42, 5210MHz 802.11ac mode (80MHz channel)
Channels 149-165, 5745-5825MHz 802.11a mode
Channels 149-165, 5745-5825MHz 802.11n mode (20 MHz channel)
Channels 149-165, 5745-5825MHz 802.11ac mode (20 MHz channel)
Channels151-159, 5755-5795MHz 802.11n mode (40MHz channel)
Channels151-159, 5755-5795MHz 802.11ac mode (40MHz channel)
Channel 155, 5775MHz 802.11ac mode (80MHz channel)

This information when programmed into the NVM will not be accessible and cannot be changed by the end user. The transmitter is approved as a non-software defined radio and OEMs and third party system integrators do not have the ability through software to allow configuration controls that would permit the device to operate outside the grant conditions per FCC KDB 594280.

Sincerely,

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Jaeho Lee / Research Engineer
BLUEBIRD INC.