Edimax Technology Co., Ltd.

No.278, Xinhu 1st Rd., Neihu Dist, Taipei City, Taiwan

Date: April 7, 2022

We, Edimax Technology Co., Ltd., declare that the device does not support channel 12 ~ 13 in 2.4GHz band and any non-US channels in all the operational mode(s) for the following product.

FCC ID: NDD9578222102

If you should have any question(s) regarding this declaration, please don't hesitate to contact us.
Thank you!

Sincerely yours,

Company Name: Edimax Technology Co., Ltd.
Contact / Title: Tracy Cheng / Senior Specialist
TEL: +886-2-7739-6639
FAX: +886-2-7739-6887
Email: tracy@edimax.com.tw

Edimax Technology Co., Ltd.

No.278, Xinhu 1st Rd., Neihu Dist, Taipei City, Taiwan

Date: 2022/04/07

Federal Communications Commission
Office of Engineering and Technology Laboratory Division
7435 Oakland Mills Rd.
Columbia MD 21046

Subject: Request for Confidentiality

FCC ID : NDD9578222102

To whom it may concern:

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules (47 CFR §§ 0.457, 0.459), we are requesting the Commission to withhold the following attachments as confidential document from public disclosure indefinitely.

Permanent Confidentiality

- Schematics Diagrams
- Block Diagram
- Operation Description

Above mentioned document contains detailed system and equipment description are considered as proprietary information in operation of the equipment. The public disclosure of above documents might be harmful to our company and would give competitor an unfair advantage in the market.

Sincerely,

Name/Title: Tracy Cheng / Senior Specialist
Company Name: Edimax Technology Co., Ltd.
Address: No.278, Xinhu 1st Rd., Neihu Dist, Taipei City, Taiwan
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To whom it may concern:

I, the undersigned, hereby authorize Underwriters Laboratories Taiwan Co., Ltd. to act on our behalf in all manners relating to application for equipment authorization, including signing of all documents relating to these matters. Any and all acts carried out by Underwriters Laboratories Taiwan Co., Ltd. on our behalf shall have the same effect as acts of our own.

I, the undersigned, hereby certify that we are not subject to a denial of federal benefits, that includes FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853(a).

In authorizing Underwriters Laboratories Taiwan Co., Ltd. as our representative, we still recognize that we are responsible to:

a) comply with the relevant provisions of the certification program;

b) make all necessary arrangements for the conduct of the evaluation, including provision for examining documentation and access to all areas, records (including internal audit reports) and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment) and resolution of complaints;

c) Make claims regarding certification only in respect of the scope for which certification has been granted;

d) Do not use our product certification in such a manner as to bring the Certification Division into disrepute and not make any statement regarding our product certification which the Certification Division may consider misleading or unauthorized;

e) Upon suspension or cancellation of certification, discontinue use of all advertising matter that contains any reference thereto and return any certification documents as required by the Certification Division;

f) Use certification only to indicate the products are certified as being in conformity with specified standards;

g) Endeavor to ensure that no certificate or report nor any part thereof is used in a misleading manner;

h) ensure that any reference to our product certification in communication media such as documents, brochures or advertising, complies with the requirements of the Certification Division;

i) keep a record of all complaints made known to us relating to the product's compliance with requirements of the relevant standard and to make these records available to the when requested;

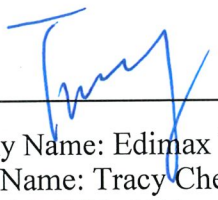
j) take appropriate action with respect to such complaints and any deficiencies found in products or services that affect compliance with the requirements for certification;

k) Document the actions taken.

This authorization is valid until further written notice from the applicant.

Sincerely Yours,

Signed by:



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Apr. 7, 2022

Software Operational Description

We, **Edimax Technology Co., Ltd.** hereby declare that:

FCC ID: NDD9578222102

SOFTWARE SECURITY DESCRIPTION	
General Description	1. Describe how any software/firmware updates for elements than can affect the device's RF parameters will be obtained, downloaded, validated and installed. For software that is accessed through manufacturer's website or device's management system, describe the different levels of security as appropriate.
	Answer: The device driver can be download from ODM website and installed by end user. This driver only can be configured as a client and there is a country code regulatory parameter to limit user to operate the device outside its authorization in the U.S. End-use cannot access that parameter. The RF parameters cannot be modified by software. The RF parameters cannot be modified by software.
	2. Describe the RF parameters that are modified by any software/firmware without any hardware changes. Are these parameters in some way limited such that any other software/firmware changes will not allow the device to exceed the authorized RF characteristics?
	Answer: The RF parameters cannot be modified by software.
	3. Describe in detail the authentication protocols that are in place to ensure that the source of the RF-related software/firmware is valid. Describe in detail how the RF-related software is protected against modification.
	Answer: No. The RF Parameters is put in read-only partition of DUT's flash and is only installed by the factory. RF parameters including frequency of operation, power settings, modulation type, antenna types or country code settings will be locked in this partition.
	4. Describe in detail any encryption methods used to support the use of legitimate RF-related software/firmware.
	Answer: No encryption, but wifi driver is a binary code file.
	5. 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?
	Answer: The device only can be configured as a client. And There is a country code regulatory parameter to limit product to operate the device under its authorization in the U.S.. This regulatory parameter would define which channel would be available to operate in client to meet UNII requirements.

SOFTWARE SECURITY DESCRIPTION	
Third-Party Access Control	6. Explain if any third parties have the capability to operate a U.S.-sold device on any other regulatory domain, frequencies, or in any manner that may allow the device to operate in violation of the device's authorization if activated in the U.S.
	Answer: There is a country code regulatory parameter to limit user to operate the device outside its authorization in the U.S.. End-use cannot access that parameter.
	7. Describe, if the device permits third-party software or firmware installation, what mechanisms are provided by the manufacturer to permit integration of such functions while ensuring that the RF parameters of the device 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.
	Answer: The RF Parameters is put in read-only partition of DUT's flash and there is not any installation process. RF parameters including frequency of operation, power settings, modulation type, antenna types or country code settings will be locked in this partition. End-user cannot access them.
	8. 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 controlled through driver software loaded in the host, describe how the drivers are controlled and managed such that the modular transmitter RF parameters are not modified outside the grant of authorization.
	Answer: This is not a modular device.

SOFTWARE CONFIGURATION DESCRIPTION	
USER CONFIGURATION GUIDE	9. 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.
	Answer: The RF Parameters is put in read-only partition of DUT's flash and there is not any installation process. RF parameters including frequency of operation, power settings, modulation type, antenna types or country code settings will be locked in this partition. End-user cannot access them.
	a. What parameters are viewable and configurable by different parties?
	Answer: Link Rate, Signal Strength, WiFi Security method and channel information.
	b. What parameters are accessible or modifiable by the professional installer or system integrators?
	Answer: N/A, as this is a consumer device.
	i. Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?
	Answer: Yes, all parameters are limited by SW settings which are approved by FCC regulatory.
	ii. What controls exist that the user cannot operate the device outside its authorization in the U.S.?
	Answer: All parameters are FCC approved and limited by SW settings.
	c. What parameters are accessible or modifiable by the end-user?
	Answer: WiFi Security method, WLAN mode and channel selection.
	i. Are the parameters in some way limited, so that the user or installers will not enter parameters that exceed those authorized?
	Answer: Yes, all parameters are limited by SW settings which are approved by FCC regulatory.
	ii. What controls exist so that the user cannot operate the device outside its authorization in the U.S.?
	Answer: WiFi Security method, WLAN mode and channel selection.

SOFTWARE CONFIGURATION DESCRIPTION	
USER CONFIGURATION GUIDE	d. Is the country code factory set? Can it be changed in the UI?
	Answer: All parameters are FCC approved and limited by SW settings.
	i. If it can be changed, what controls exist to ensure that the device can only operate within its authorization in the U.S.?
	Answer: The country code cannot be changed in UI.
	e. What are the default parameters when the device is restarted?
	Answer: The device will get a default (approved) Tx channel and power level based on factory country setting.
	10. 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.
	Answer: No.
	11. 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?
	Answer: The device only can be configured as a client. And there is a country code regulatory parameter to limit product to operate the device under its authorization in the U.S. This regulatory parameter would define which channel would be available to operate in client to meet UNII requirements.
	12. 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))
	Answer: N/A, as not supported by this device.

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