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DFS client device channel plan and software operational declaration

Date: 2018-08-16

We, <u>NETGEAR</u>, <u>Inc.</u>, declare that the device, FCC ID: <u>PY318100406</u> Model Name: <u>Otter</u>, does not have "Ad Hoc on non-US frequencies" and/or "on DFS frequencies. Also, the client software and associated drivers will not initiate any transmission on DFS frequencies without initiation by a master. This includes restriction on transmissions for beacons and support for ad-hoc peer-to-peer modes.

Below is the channel / frequency plan for the device

СН	1	2	3	4	5	6	7	8	9	10	11
Frequency (MHz)	2412	2417	2422	2427	2432	2437	2442	2447	2452	2457	2462
Scan Type	Active										
							•				
СН	36	38	40	42	44	46	48				
Frequency (MHz)	5180	5190	5200	5210	5220	5230	5240				
Scan Type	Active										
	•	•	•	•	•	•	1	•	•		
СН	52	54	56	58	60	62	64				
Frequency (MHz)	5260	5270	5280	5290	5300	5310	5320				
Scan Type	Active										
	•	•	•	•	•	•	1	•	•		
СН	100	102	104	106	108	110	112	116	118	120	
Frequency (MHz)	5500	5510	5520	5530	5540	5550	5560	5580	5590	5600	
Scan Type	Passive										
СН	122	124	126	128	132	134	136	138	140	142	144
Frequency (MHz)	5610	5620	5630	5640	5660	5670	5680	5690	5700	5710	5720
Scan Type	Passive										
СН	149	151	153	155	157	159	161	165			
Frequency (MHz)	5745	5755	5765	5775	5785	5795	5805	5825			
Scan Type	Active										

Also, on DFS channels, the WLAN driver in the device operates under the control of an AP at all times, except when in ad-hoc mode, on US non-DFS channels. The device passively scans DFS frequencies until a master device is detected. The control of this functionality is not accessible to anyone under any conditions. Furthermore, the firmware is protected by special signature and CRC checksum. Signature and CRC checksum will be calculated and verified before firmware upgrade. Unauthorized modification to firmware will lead the failure of verification thus firmware upgrade is not allowed.

Sincerely yours,

David Kay / Regulatory Compliance Director

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