

Non-Router Device Declaration letter

Federal Communications Commission
7435 Oakland Mills Road
Columbia MD 21046

Dear Sir/Madam,

We hereby declare that the following product:

Product: Repeater
FCC ID: 2BCMP-A18
Model: A18, A20
Brand: N/A

NIST IR 8425A defines a consumer-grade router as a Layer 3 (Network Layer) device that forwards IP packets between distinct networks, acting as the gateway between a home LAN and the Internet.

Wi-Fi Repeater mode: Operate at Layer 1 (Physical Layer). They only amplify and retransmit signals, with no ability to parse IP packets, maintain routing tables, or create new networks.

AP Mode: Operates at Layer 2 (Data Link Layer). It disables all routing functions (NAT, DHCP, firewall) and forwards data based on MAC addresses. It merely extends an existing network rather than acting as an independent gateway.

Neither device performs the core IP routing function that defines a router under this standard.

The above product is designed and marketed as a repeater and AP. The device operates solely in AP mode and Wi-Fi Repeater mode. It does not implement any Layer 3 routing functionality.

Therefore, this device shall be classified as a repeater and AP rather than a router and is appropriate for FCC certification under the applicable rules for intentional radiators without routing functionality.

Sincerely,



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