



Garmin International, Inc.
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Federal Communications Commission

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Columbia, MD 21046 USA

**Certification and Engineering Bureau
Innovation, Science and Economic Development**

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3701 Carling Avenue (Building 94)
Ottawa, Ontario, K2H 8S2
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**FCC ID: IPH-06781
IC : 1792A-06781**

Software security description

To whom it may concern:

We,

Garmin International, Inc.
1200 East 151st Street, Olathe, Kansas 66062

herewith declare:

General Description	1. Describe how any software/firmware updates for elements that 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.	The Head unit is locked, and the SW is signed. IP related keys are stored in the Security Area. The SW will be updated via Workshop or over the air. Only correctly signed SW could be updated. The System rejects not signed or incorrectly signed SW. To identify if the new SW affects the RF parameters all elements in the related repository are generally marked as RF relevant or not. In case a RF relevant sw will be changed and updated a review before release is necessary. Based on the review result retesting could be necessary for validation. Only if these are fine the SW will be accepted for release.
	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?	For configuration of the RF parameters a related regdbin/NVRAM/BDF files as part of the SW flashed in production is released. This contains the necessary RF information for configuration. The parameters are limited and configured according to the setting validated during homologation. There is no software in the system able to change the listed files.
	3. Describe in detail the authentication protocols that are in place to ensure that the source of the	Only correctly signed SW could be updated. The System rejects not signed or incorrectly signed



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	RF-related software/firmware is valid. Describe in detail how the RF-related software is protected against modification.	SW. For updating this SW after validation, it must be signed for the device. The update mechanism proves the signs.
	4. Describe in detail any encryption methods used to support the use of legitimate RF-related software/firmware.	Based on the CRIN the SW of the device will be signed during production phase, for an update the CRIN must be used for signing new SW. Only signed SW could be installed.
	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?	5150-5250 MHz: Master and Client Mode, active / Passive Scanning 5250-5350 MHz: Device does not operate in this frequency Band 5470-5725 MHz: Device does not operate in this frequency Band 5750-5850 MHz: Master and Client Mode, active / Passive Scanning The CIVIC Device is certified according to Wi-Fi Alliance Standards for all modes. Legal compliance will be checked by homologation test. Correct behaviour regarding security will be validated by security process penetration testing.
Third-Party Access Control	1. 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.	This is not possible because: The device is configured in production as an US Variant with the related parameters for the RF parts. For correct settings the devices use geo location.
	2. 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.	There is no 3 rd party SW available with access to the RF parameters of the related components.
	3. For Certified Transmitter modular devices, describe how the module grantee ensures that host manufacturers 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	NA



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	controlled and managed such that the modular transmitter RF parameters are not modified outside the grant of authorization.	
User configuration guide	1. 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.	The end user can only activate and de activates the RF feature by HMI UI. There is no option for changing the parameters. There is no other access to the system The system is locked and can only be used by the UI.
	a. What parameters are viewable and configurable by different parties?	None, see 1. Not in production release SW.
	b. What parameters are accessible or modifiable by the professional installer or system integrators?	None, see 1. Not in production release SW.
	(1) Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?	None, see 1. Not in production release SW
	(2) What controls exist that the user cannot operate the device outside its authorization in the U.S.?	The device is preconfigured according to US homologation.
	c. What parameters are accessible or modifiable by the end-user?	None
	(1) Are the parameters in some way limited, so that the user or installers will not enter parameters that exceed those authorized?	NA
	(2) What controls exist so that the user cannot operate the device outside its authorization in the U.S.?	NA
	d. Is the country code factory set? Can it be changed in the UI?	The device country code factory preset for US. The country code could not be changed by the UI.
	(1) If it can be changed, what controls exist to ensure that the device can only operate within its authorization in the U.S.?	NA
	e. What are the default parameters when the device is restarted?	Default Country Code is US Parameters are according to US homologation in config files. See2
	2. 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.	NA
	3. 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?	NA
	4. 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	Device is capable to be an access point and offers MIMO and SISO. The parameters are preconfigured based on the passed



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	compliance with applicable limits and the proper antenna is used for each mode of operation. (See Section 15.407(a))	homologation and certification tests and could not be changed.
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Sincerely,

A handwritten signature in cursive script that reads "William H. Pertner".

By: William H. Pertner
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