



Subject: Attestation – Non-Consumer Grade Router Classification

To:

Federal Communications Commission
Office of Engineering and Technology
Laboratory Division

Date: [6/02/2026]

To Whom It May Concern:

Pursuant to the Federal Communications Commission’s guidance regarding routers included in the Covered List and the definition of “consumer-grade routers” as referenced in NIST IR 8425A, Ubiquiti hereby provides the following attestation with respect to the device(s) identified below.

Device Information

- Product Name: [SuperLink Gateway HA]
- FCC ID: [SWX-USLGGH]
- Model Number(s): [USL-G2-Gateway-HA]

Attestation Statement

Ubiquiti declares that the above-referenced equipment:

1. **Technical Functionality:** The product is a LoRa/SuperLink, Thread, and LTE Cat 1 bis IoT gateway for UniFi Protect / sensor and low-power device applications. Its function is to support constrained sensor and Thread endpoints, not to provide Internet access to ordinary customer client devices. The integrated LTE Cat 1 bis interface is used exclusively for IoT data backhaul and remote management backup communication; it does not provide general Internet access to client devices and does not function as a cellular WAN uplink for end-user traffic. Any IP forwarding associated with Thread is constrained to the Thread IoT network and related application/service traffic. It does not provide general-purpose routing between customer LAN and WAN networks, does not advertise itself as a household Internet gateway for Ethernet/Wi-Fi client devices, and does not substitute for a consumer home router.
2. **Absence of Routing Features:** The product does not provide the ordinary feature set of a consumer-grade router or residential gateway, including NAT, DHCP server for a client LAN, configurable LAN/WAN routing, firewall policy management for household networks, VPN, port forwarding, or household-client traffic management.



3. **Exclusion from Router Scope:** The device contains no user-configurable consumer distribution matrices, high-throughput consumer Wi-Fi Access Point (AP) routing radios, residential Virtual Private Network (VPN), or firewalls typically inherent to consumer-grade network routers or commercial ISP residential gateways. The LTE Cat 1 bis cellular interface present in this product is limited to IoT backhaul and management backup purposes and does not constitute a consumer-facing WAN interface for general broadband routing.
4. **Deployment Context:** The device is designed for specific industrial, enterprise, or IoT applications to manage low-power infrastructure and is not intended for residential consumer use, nor installation by typical consumer users.

Basis for Classification

This determination is based on the FCC's interpretation that consumer-grade routers are devices primarily intended for residential use. With the above-stated technical assumptions and operational realities, despite the "gateway" naming, this product does not meet the definition or functional criteria of a router and should not be considered a consumer-grade router or residential gateway under the referenced determination. Consequently, it should be excluded from the scope of the Covered List regarding consumer-grade network routing devices.

Declaration

This attestation is made based on information reasonably available to Ubiquiti at the time of submission. Ubiquiti affirms that the statements above are accurate to the best of its knowledge.

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