

Lightcomm Technology Co., Ltd.

UNIT 1306 13/F ARION COMMERCIAL CENTRE, 2-12 QUEEN'S ROAD WEST, SHEUNG WAN HK

Date: 2025-12-23

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

Subject: **SOFTWARE SECURITY REQUIREMENTS FOR U-NII DEVICES for:**

FCC ID: XMF-MID7030

SOFTWARE SECURITY REQUIREMENTS FOR U-NII DEVICES		
REF KDB 594280 D02 U-NII Device Security v01r03		
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.	We do not release the firmware on our website for downloading. Our direct host manufacturer (OEM) can request the firmware from us and it will be made available via secure server.
	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?	Radio frequency parameters are limited by US regulatory domain and country code to limit frequency and transmit power levels. These limits are stored in non-volatile memory by the module manufacturer at the time of production. They will not exceed the authorized values.
	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.	The firmware is installed on each single module during manufacturing process. The correct firmware is verified and installed by the module manufacturer. In addition, the firmware binary is encrypted using open SSL encryption and the firmware updates can only be stored in non-volatile memory when the firmware is authenticated. The encryption key is known by the module manufacturer only.
	4. Describe in detail any encryption methods used to support the use of legitimate RF-related software/firmware.	The process to flash a new firmware is using a secret key to decrypt the firmware, only correct decrypted firmware is stored in non-volatile memory (see #3).
	5. For a device that can be configured as a master and client (with active or passive	he device ensures the compliance by checking the configured parameter

Lightcomm Technology Co., Ltd.

UNIT 1306 13/F ARION COMMERCIAL CENTRE, 2-12 QUEEN'S ROAD WEST, SHEUNG WAN HK

	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?	and operation values according to the regulatory domain and country code in each band. The device configured as Client without radar detection capability
--	--	--

Lightcomm Technology Co., Ltd.

UNIT 1306 13/F ARION COMMERCIAL CENTRE, 2-12 QUEEN'S ROAD WEST, SHEUNG WAN HK

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.	No, third parties don't have the capability to access and change radio parameters. US sold modules are factory configured to US.
	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.	N/A
	3. 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 parameters are not modified outside the grant of authorization.	N/A
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.	There is no user configuration GUI.
	a) What parameters are viewable and configurable by different parties?	There is no user configuration GUI.
	b) What parameters are accessible or modifiable by the professional installer or system integrators?	This device is not subject to professional installation
	(1) Are the parameters in some way limited, so that the installers will not enter parameters that exceed those authorized?	This device is not subject to professional installation
	(2) What controls exist that the user cannot operate the device outside its authorization in the U.S.?	This device is not subject to professional installation
	c) What parameters are accessible or modifiable to by the end-user?	The end user is not able to configure any parameters related to the devices
User		

Lightcomm Technology Co., Ltd.

UNIT 1306 13/F ARION COMMERCIAL CENTRE, 2-12 QUEEN'S ROAD WEST, SHEUNG WAN HK

Configuration Guide <i>(Continue)</i>		radio
	(1) Are the parameters in some way limited, so that the user or installers will not enter parameters that exceed those authorized?	The parameters can only be changed remotely within the limits of country code US.
	(2) What controls exist that the user cannot operate the device outside its authorization in the U.S.?	The country code and regulatory domain control do limit all the parameters set
	d) Is the country code factory set? Can it be changed in the UI?	The country code is factory set and is never changed by 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.?	The country code is factory set and is never changed by UI
	e) What are the default parameters when the device is restarted?	At each boot up the country code and the antenna gain are read from the non-volatile memory, those values are configured during production.
	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.	Not supported
	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?	Not supported
	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 compliance with applicable limits and the proper antenna is used for each mode of operation. (See Section 15.407(a))	The device does not support these modes/features.

Lightcomm Technology Co., Ltd.

UNIT 1306 13/F ARION COMMERCIAL CENTRE, 2-12 QUEEN'S ROAD WEST, SHEUNG WAN HK

Sincerely,

(Signature of applicant)

A handwritten signature in black ink that reads "Jack Sun". The letters are cursive and fluid, with the first letter of each name being capitalized.

Name/Title:	Jack Sun/ Certification Manager
Company:	Lightcomm Technology Co., Ltd.
Address:	UNIT 1306 13/F ARION COMMERCIAL CENTRE, 2-12 QUEEN'S ROAD WEST, SHEUNG WAN HK
Phone:	0085221913611
Fax:	0085221913612
E-Mail:	sunshuhui@hcn2000.com