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31st January 2022

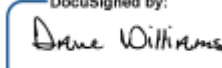
FCC: 2A3C5XYZ2201

IC: 28181-XYZ221

Attestation - Atom Controller - Software Security Statement

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.	<p>There is no downloadable software provided by the manufacturer that can modify critical radio transmitter parameters.</p> <p>All RF parameters are programmed in OTP memory at the factory and cannot be modified by third parties.</p>
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?	<p>There are no RF parameters that can be modified.</p> <p>All RF parameters are programmed in OTP memory at the factory and cannot be modified by third parties.</p>
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	<p>The firmware is programmed at the factory and cannot be modified by third parties.</p>
4	Describe in detail any encryption methods used to support the use of legitimate RF-related software/firmware.	<p>The firmware is programmed at the factory and cannot be modified by third parties.</p>
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?	<p>This WLAN is a client module only.</p> <p>The firmware is programmed at the factory and cannot be modified by third parties.</p>

3rd 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.	Third parties do not have the capability to operate in any manner that is in violation of the certification in the U.S.
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.	RF parameters are programmed in the OTP memory at the factory and cannot be reprogrammed or re-flashed by third parties.
3	<p>For Certified Transmitter modular devices, describe how the module grantee ensures that host manufacturers fully comply with these software security requirements for UNII devices.</p> <p>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 RF parameters are not modified outside the grant of authorization.</p>	<p>There are no RF parameters that can be modified.</p> <p>All RF parameters are programmed in OTP memory at the factory and cannot be modified by third parties.</p> <p>The module is not controlled by driver software on the host and cannot be override critical RF parameters stored in the module OTP memory.</p>

DocuSigned by:

DX2A3C5-28181

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