

November 4, 2016

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Subject: Software Configuration of Non-SDR Devices: Halo and Halo+
White Stagg, LLC, dba Halo Smart Labs
FCC ID: 2AGBQLS001A

To Whom It May Concern:

White Stagg, LLC, dba Halo Smart Labs, is utilizing the Texas Instruments CC3200 SimpleLink™ Wi-Fi® and Internet-of-Things solution, a Single-Chip Wireless MCU for the purpose of WLAN connectivity in both the Halo and Halo+ devices. Halo and Halo+ are non-SDR devices that utilize software configurations for their radio parameters. The purpose of this document is to provide a description of how this configuration is implemented to preclude third-party modification of the radio parameters.

Texas Instruments, for the explicit purpose of configuring the radio for a specific regulatory domain, gives the embedded programmer the ability to set the country code in which the device will operate. The country code can be set for all of the utilized modes of operation for the WLAN subsystem. For example, use of the U.S. country code limits the device's operational WLAN channels to channels 1-11.

The U.S. country code will be hard-coded in the embedded firmware such that users will not have an option to alter this setting. In this context, hard-coded means that there is no option in the device for access to, or changes in, the country code. Furthermore, there are no advanced setting options for use by third-party end users, service providers, operating system providers, application developers, OEM integrators, professional installers, or authorized service dealers to alter the radio configuration through a program variable, setting, or parameter.

Furthermore, there are no ports for hard-wired access, such as a USB port, and the embedded software utilizes security protection. Halo Smart Labs has the ability to upgrade the embedded firmware for the purposes of bug fixes and for future firmware enhancements. These changes are formulated in Halo Smart Labs' offices, and the software program is then re-compiled. Once re-compiled, it may not be changed in the field. The country code is not to change in these changes.

Sincerely,



Stephen Sheppard
Hardware Design Engineer