

Attn:

June 18, 2025

Federal Communications Commission

Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046 USA

To Whom It May Concern:

SUBJECT: Demonstration of inherent compliance for attestation statement 2.911(d)(5)(i)
FCC ID: 2BPVG-WDSREC3

The product is inherently compliant based on the fundamental design of the equipment, which makes it incapable of incorporating or running such software. The justification for this is as follows:

- **System Architecture and Operating System:** The devices do not operate on a general-purpose operating system (e.g., Linux, Android, Windows) that would be required to run a complex software application like Kaspersky. Instead, they are built upon an STM32 microcontroller running custom, dedicated firmware developed specifically for the device's function.
- **Single-Purpose Functionality:** The firmware is purpose-built for the singular function of establishing and maintaining a secure LoRa communication link to control industrial equipment. The software stack contains no libraries, APIs, or environments that could support or execute unrelated, third-party applications.
- **Closed System with No Software Installation Path:** The devices are designed as completely closed systems. There are no provisions for end-users or any third parties to load, install, or modify the software. Specifically, the devices lack:
 - A user-accessible file system.
 - General-purpose data ports (e.g., USB mass storage) for transferring applications.
 - Network connectivity (e.g., Wi-Fi, Ethernet) for downloading software.
 - An interface or "app store" for software installation.
- **Hardware Resource Limitations:** The hardware resources, including the microcontroller's processing power, RAM (8 KB), and non-volatile memory (64 KB), are sized specifically for the device's intended and limited function. These resources are insufficient to support a large, resource-intensive software suite like an anti-virus engine.

Sincerely,



Sean Haliburton
Director
Orbital Sandblasting