



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

May 4, 2006

RE: Visonic Technologies (1993) Ltd.

FCC ID: GSA-ETC00433

After a review of the submitted information for FCC, I have a few comments on the above referenced Application.

- 1) Recent information from the FCC now requires that the confidentiality letter be signed by either the contact shown on the FCC site for the grantee, or one of the contacts shown as the technical or non-technical contacts given on the 731 form. Please correct.
- 2) It can not be adequately determined if the labeling information includes an actual sample label or not. Please review.
- 3) Table 7.1.1 cites "Continuous transmissions are permitted". Is this meant to say NOT permitted or permitted? Please review.

For the following comment, the device appears to be capable of the following transmissions:

- a) Tamper
- b) Button Pressed
- c) Periodic TX
- d) When Entering Fields
- 4) The users manual (and test report plot 7.2.18) suggests the device transmits every 5 seconds when in motion. This would violate 15.231(e) and appear not to match the information provided in the test report (plot 7.1.4) which suggests period transmission is every 10.5 sec. Please review.
- 5) Field entry (i.e. LF mode) appears to suggest continuous transmissions. This does not appear to meet the timing requirements of 15.231(a) or (e). Entering a field would be deemed an external event which would be automatic transmission and limited to 5 seconds. Please review.
- 6) Please provide test data supporting timing of button pressed (and tamper) as shown in the users manual. Are these considered 15.231(a) or (e) transmissions. It appears that 4 times 400 mec will exceed the 15.231(e) requirements.
- 7) If emissions fall under 15.231(a) for certain transmission, is the power level TX the same or different? Please explain.
- 8) Is the TX pulse duration (i.e. 1.89 msec duration) different for the various modes of TX (tamper, button press, periodic TX, and entering fields) or the same regardless of type of transmission? Is the duty factor applied valid for all modes?
- 9) Test photographs appear to support an anechoic chamber only and not an OAT's or semi-anechoic chamber. It is uncertain if this was tested in an appropriate facility given under 2.948. Please explain.
- 10) FYI....Grant may actually list both 15.231 and 15.231(e) depending on the response to items 4 – 8.

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Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination.

Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.