

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

December 24, 2004

RE: Visonic Ltd.

FCC ID: GSAMCT241MDRL

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

1) Your previous response to comment 1 states that there is no "special" transmission for low battery message. Note the following from the users manual does mention including it during normal transmissions, but also mentions a "low battery message will be transmitter" ,.... and included in every normal transmission. Please provide information on how the transmitted low battery message that is not included in normal transmission meets 15.231 requirements.

2.3 Low Battery Voltage Indication

The battery is automatically tested under load once in 12 hours. If a low battery state is registered in 3 consecutive tests, a "low battery" message will be transmitted, and a "low battery" digital marker will be included in every transmission, "alarm" or "tilt". In addition, when the battery voltage is low, the LED flashes while the pushbutton is pressed.

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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.