

April 29, 2005

The Hong Kong Standards and Testing Centre Ltd., 10 Dai Wang Street, Taipo Industrial Estate, Taipo, N.T., Hong Kong.

Attn.: Mr. Patrick Wong

Re: FCC ID marking for Jandy PDA and Wireless SpaLink systems

Dear Sir:

In reference to the currently on-going FCC certification process for the above referenced systems, please accept this as our formal request to allow us to exercise the option presented in the FCC rules 47 CFR Ch. 1, Section 15.19(a)(5). This clause allows us to place the FCC statement required in section 15.19(a)(3) in "a prominent location in the instruction manual or pamphlet supplied to the user...", if it is not practicable to place the statement on the product.

Due to the limited nature of the available space on the product it will be difficult to include the whole statement, in a legible form, on it. Therefore, we intend to place the required statement on the first page of the user instructions manual. We will of course, clearly display the FCC Identifier (ID number) on the product, as required by the referenced section 15.19(a)(5).

We trust that by doing so, we will be exercising an available option in the FCC rules.

If there are any questions regarding this, please do not hesitate to contact our offices. We thank you for your understanding and cooperation.

Sincerely,

Shajee Siddigui

Director, Product Safety & Compliance

Laars, Inc.

d/b/a Waterpik Technologies Pool Products & Heating Systems