



HERMON LABORATORIES

May 18, 2005

American TCB
6731 Whittier Ave
Suite C110
McLean, VA 22101
Attn: Mr. T. Johnson, Examining Engineer

RE: your e-mail dated May 17, 2005; Visonic Ltd.
FCC ID:GSAMCT212, ATCB002326

Dear Mr. Johnson,
Please find below the answer to your questions.

The average factor remains the same.
Let me repeat the supporting argument :

With the 3 seconds of transmission:

1. There are 2 to 8 pulse trains/blocks
2. Within each block there are 6 to 21 messages.

BUT:

Since each message's duration is fixed (i.e. does not vary) and is about 44 milliseconds.
Within 100 milliseconds there are two messages and the average remains the same regardless of the variations of number of pulse trains/block and number of messages.

I hope this is clear now.

Best Regards,

Arick Elshtein
International standards manager
Visonic Ltd.

Marina Cherniavsky,

certification engineer
Hermon Laboratories