



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

September 20, 2005

RE: Visonic Ltd.

FCC ID: GSAMKP150

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

- 1) The block diagram should show the frequencies of all oscillators in the TX portion of the device (CFR 2.1033(a)(5)), unless this portion of the device is an OEM part from a different manufacturer. Please provide either the block diagram for the TX portion, or alternatively provide a parts list that shows that this part is provided by another manufacturer. Please update the list of confidential exhibits if necessary.
- 2) The Label Cites "FCC ID: GSAMKP150". Please remove the extra "." shown in the label.
- 3) The label would appear to require the statement of 15.19(a)(3). Please update or justify why is it not present.
- 4) It is uncertain if all commands have the same pulse train nature. Please explain. For instance, do the PANIC buttons only transmit the pulse train showing. Please ensure this and other commands do not transmit for the duration of the alarm condition. If necessary, please provide a theory of operation that explain this information.
- 5) When numbers are typed for arming/disarming, it is uncertain if each number is transmitted, or if a code is transmitted only after the complete code is entered. Please comment on how this occurs and explain compliance under 15.231 rules.
- 6) Regarding Supervision or polling messages, the manual states once per 60 seconds to be USA compliant. However the installer can select either 15 minutes or once per hour repetitions. This appears to be out of compliance with 15.15 of the rules. Please explain. In order to be in compliance with 15.15 for units in the U.S.A, the option of 15 minutes should not be allowed even in the installer menus.
- 7) The device appears to record voice, but it is uncertain if this is transmitted or only stored internally. Please note that 15.231 does not allow for voice transmission. Please comment.
- 8) Using worse case Transmission over 100 ms period of time, it appears a correction factor of 2.79 dB may apply instead of 3.46 dB. This is a difference of 0.7 dB and would place the device over the limits at the fundamental. Please revisit the correction factor. Note I show the first part of the pulse transmits 83.8056%, 2nd part transmits at 64.81481%, and 3rd part transmits at 66.0377%. Using the first 100 msec gives a correction factor of 2.79 dB.

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.