



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

September 22, 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 information provided appears to show the RF board is made by the applicant. Therefore this application should include the block diagram for just the TX board which should show the frequencies of all oscillators in the TX portion of the device (CFR 2.1033(a)(5)).
- 2) Normally the FCC only allows placement of the label information in the manual if the device is smaller than 8 x 10 cm. The device appears to be of such size that it can be fit elsewhere on the device. Placement other than on the device will require an interpretation from the FCC that finds it ok for this instance. If the applicant still desires to pursue labeling in the manual instead of on the device, please let us know and we will take a few days to ask the FCC to review this issue and provide a response (normally takes 3 – 5 days). Alternatively, please update the current label or provide information regarding a 2nd label for the device.
- 3) The new test report provided appears to adjust the worse case duty cycle correction factor from 3.46 dB to 3.02 dB for averaging. However it is uncertain how this is defined as the worse case duty factor. From an analysis if the data performed, it appears that a worse case factor of 2.79 dB still exists. Please see provided excel sheet which details this. Please review and explain/correct the application as necessary. As small a difference as this correction factor appears to be, it still appears to show the unit as over the limit if the 2.79 dB correction factor is used. Please review.
- 4) The previous response to comment 4 is a good explanation, but it is still not clear if any commands can continue to transmit for the duration of the alarm (i.e. panic). Your response suggests that no command will continue to transmit for the duration of the alarm condition. Please confirm as any command that will transmit for the duration of an alarm condition will require further discussion. Please confirm.

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.