

1) The Block diagram should be updated to show the oscillators for the TX module portion of the device as specified by 2.1033(b)(5) of the rules. Please update the block diagram to show the crystal oscillator to the Transmitter module and be sure to show its frequency.

Wallace Reply>>>>Please refer revised Block diagram

2) The device label appears to still need some work. Each product must have both the FCC ID and the two-part warnings of 15.19(a)(3) on the device. It appears the 2 part statement is not on this device but is only on the RX portion of the system. Please correct the device labeling to include this:
This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

Wallace Reply>>>>Please refer revised label file location that we suggest client.

3) Your last response mentioned providing an updated manual containing 15.21 statements. However the recent updated manual did not appear to correct this, please add the following to the users manual and provide this updated manual: The user is cautioned that changes and modifications made to the equipment without the approval of manufacturer could void the user's authority to operate this equipment.

Wallace Reply>>>>Please refer revised user manual.

4) The users manual should also contain information regarding compliance of 15.105(b). Please update the manual to include this information or similar:
Note: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation. This equipment generates, uses and can radiate radio frequency energy and, if not installed and used in accordance with the instructions, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:
—Reorient or relocate the receiving antenna.
—Increase the separation between the equipment and receiver.
—Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
—Consult the dealer or an experienced radio/TV technician for help.

Wallace Reply>>>>Please refer revised user manual

5) Please adjust the schematics to only show the schematics for the FCC ID of the application being reviewed. It appears the schematics currently provided may be for 3 or more different devices.

Wallace Reply>>>>Please refer revised schematic.

6) Data presented in section 4.2 appear to be for a manually activated device which does not appear to be the case for this application. Please ensure proper data is in the report and correct as necessary since the device covered by this application does not appear to be manually activated or contain buttons, therefore the information in this section of the report appears to not apply.

Wallace Reply>>>> Please refer revised test report that erase mentioned section.

7) This device appears to possibly transmit using 4 different intervals according to the operational description provided. It is uncertain if the device continues to use the same interval or if the device attempts to use pseudo-random chosen interval to meet the requirements of 15.231(a)(3) requirements below:

(a)(3) Periodic transmissions at regular predetermined intervals are not permitted. However, polling or supervision transmissions, including data, to determine system integrity of transmitters used in security or safety applications are allowed if the total duration of transmissions does not exceed more than two seconds per hour for each transmitter. There is no limit on the number of individual transmissions, provided the total transmission time does not exceed two seconds per hour. However, please note that whether the device uses a set interval, or pseudo random interval, interpretations from the FCC regarding this sections of the rules do not allow for periodic transmissions, even if pseudo-random intervals are used. I have provided an interpretation in an attached exhibit which shows fact. Therefore it appears there are only 2 options available:

1) The device would be required to be certified under 15.231(e) of the rules.

Please note that the device nearly meets this but it currently appears the fundamental slightly exceeds the limits by 1.4 dB and 2nd harmonic exceeds the average limit. Many other similar devices have been certified under this section of the rules.

2) To meet with 15.231 (a)(3) may only be done if the transmissions only occur if a change due to an external event has occurred. The device would NOT be allowed to transmit again unless a change due to the external event has occurred. The thresholds of these changes would be required to be explained in the report (i.e., temperature transmits only when changing by 2 degrees, etc.). However the other concern with 15.231(a)(3) is that you are not really sending a control signal, but only data. For this reason, it appears that the device will only be fully compliant following 15.231(e) option given in a unless a good explanation of

what control codes are sent.

Wallace Reply>>>> Please refer revised test report that the EUT follows 15.231(e)

8) The duty cycle information provided should support the 0.5 ms data bit timing interval by showing a measurement of

Wallace Reply>>>> Please refer revised test report.