

ORIGINAL

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of

UltraVision Security Systems, Inc.,
Experimental License WD2XYH

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File No. 0105-EX-PL-2006

TO: Experimental Licensing Branch
Office of Engineering and Technology

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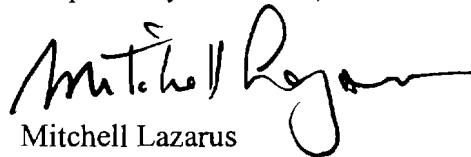
Federal Communications Commission
Bureau / Office

Motion for Leave to File Additional Pleading

UltraVision Security Systems, Inc. requests permission to file the attached "Response of UltraVision Security Systems, Inc." in the above-captioned proceeding, despite its not being authorized under Section 1.45 of the Commission's Rules.

The pleading is filed to correct certain incomplete and misleading statements in the "Reply to Opposition of UltraVision Security Systems, Inc." of Association for Maximum Service Television, Inc. (filed March 21, 2007).

Respectfully submitted,



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Counsel for UltraVision Security Systems, Inc.

March 26, 2007

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In the Matter of	)	
	)	
UltraVision Security Systems, Inc.,	)	File No. 0105-EX-PL-2006
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TO: Experimental Licensing Branch
Office of Engineering and Technology

**Response of UltraVision Security Systems, Inc.
to "Reply to Opposition of UltraVision Security Systems, Inc."
of Association for Maximum Service Television, Inc.**

On February 27, 2007, the Association for Maximum Service Television, Inc. (MSTV) filed a "Petition to Rescind or Modify Experimental License" against License WD2XYH held by UltraVision Security Systems, Inc. UltraVision opposed on March 14, 2007. MSTV filed a "Reply to Opposition of UltraVision Security Systems, Inc." (Reply) on March 21, 2007.

UltraVision files this Response to correct certain incomplete and misleading statements in MSTV's Reply.

1. Cost of testing. MSTV (Reply at 3-4, 5) says that UltraVision ignored MSTV's repeated requests for testing by an outside engineering firm. But MSTV wanted UltraVision to pay the entire cost of the testing, which an MSTV official informally estimated to be in the \$20-30,000 range. UltraVision made the decision against testing on financial grounds.

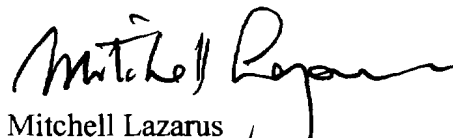
2. Interference potential of Section 15.209 compliant device. MSTV (Reply at 2-3) notes that Section 15.209 limits are 5 dB higher than the signal level of a DTV station at its protected contour. That is true, however, only at a distance of 3 meters from the Part 15

compliant device. UltraVision proposes to operate at many times that distance from the nearest residence.

3. Type of signal. MSTV (Reply at 4) alleges there is "no significant difference" between the interference caused by UltraVision's signal and by a "continuous signal of similar signal strength." At the relevant frequencies, the Commission specifies quasi-peak emissions for compliance testing. Because of its low duty cycle, an UltraVision device having compliant quasi-peak emissions transmits far less energy than a device emitting a continuous signal with the same quasi-peak emissions. MSTV offers no basis for its claim that the two interfere equally, other than its own speculation. In any event, UltraVision proposes a separation distance based on MSTV's own estimate of the interference distance for a continuous signal.

4. Non-Residential Protection. MSTV (Reply at 5-6) objects to possible interference at places of business. But the only likely interference victim is the same company that installs the UltraVision security system. That company should have the option of choosing which technology it prefers to use.

Respectfully submitted,

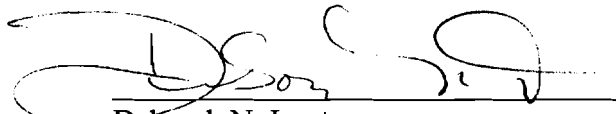


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March 26, 2007

CERTIFICATE OF SERVICE

I, Deborah N. Lunt, a secretary with the law firm of Fletcher, Heald & Hildreth, PLC, hereby state that true copies of the foregoing MOTION FOR LEAVE TO FILE ADDITIONAL PLEADING and RESPONSE OF ULTRAVISION SECURITY SYSTEMS, INC. TO "REPLY TO OPPOSITION OF ULTRAVISION SECURITY SYSTEMS, INC." OF ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC. have been served this 26th day of March, 2007, by first class mail, postage prepaid, to the following listed on the attached Service List, except that persons having addresses listed at the Federal Communications Commission were served by hand and/or by email.


Deborah N. Lunt

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