EXHIBIT D

REPORT OF MEASUREMENTS

REPORT OF MEASUREMENTS

APPLICANT	MANUFACTURER
X-10 USA, Inc. 91 Ruckman Road Closter, NJ 07624	X-10 Electronics Shenzhen Co. Ltd. X-10 Building Labour Industrial District Shenzhen, Xixiang, Bao An Guang Dong, China, 518102

TEST SPECIFICATION: FCC Rules and Regulations Part 15, Subpart C

TEST PROCEDURE: ANSI C63.4:1992

TEST SAMPLE DESCRIPTION

BRANDNAME: X-10 MODEL: HP564B

TYPE: Heart Pendant RF Pulsed Transmitter

POWER REQUIREMENTS: 3 VDC Batteries

FREQUENCY OF OPERATION: 310 MHz

FCC ID: B4SHP564A

TESTS PERFORMED FOR CLASS II PERMISSIVE CHANGE TO FCC ID: B4SHP564A

Para. 15.231(a), Radiated Emissions, Fundamental and Harmonics

Para. 15.231(c), Occupied Bandwidth

I HEREBY CERTIFY THAT: The measurements shown here were in accordance with the procedure indicated and that the energy emitted by this equipment was found to be within the limits applicable. I assume full responsibility for the accuracy and completeness of these measurements and vouch for the qualifications of all persons taking them.
I FURTHER CERTIFY THAT: On the basis of the measurements made, the device tested is capable of operation in compliance with the requirements of Part 15, Subpart C of the FCC Rules under normal use and maintenance.

SIGN	PRINT	TITLE
	Thomas J. Schneider	EMC Test Engineer

REPORT OF MEASUREMENTS

Applicant:	X-10 (USA), Inc.
Device:	310 MHz Heart Pendant RF Pulsed Transmitter
FCC ID:	B4SHP564A
Power Requirements:	3 VDC Batteries
Applicable Rule Section:	Part 15, Subpart C, Section 15.231

TEST RESULTS

15.231 (a) -	The device is used as a Personal Assistance Alarm Transmitter for Safety of Life purposes
15.231 (a)(1) -	The transmitter is manually operated.
15.231 (b)(2) -	The transmitter is manually activated and employs a switch that automatically deactivates the transmitter within not more than 5 seconds after being released.
15.231 (a)(3) -	The transmitter does not perform periodic transmissions.
15.231 (a)(4)-	The device is employed for RC purposes involving Safety of Life.
15.231 (b)-	The fundamental field strength did not exceed 5830μV/M (Average) at a test distance of 3 meters. In addition, the requirements of section 15.35 for averaging pulsed emissions and for limiting peak emissions were met. The field strength of harmonic and spurious emissions did not exceed 583μV/M (AVERAGE).
15.231 (c) -	The device operates at 310 MHz. The bandwidth of emissions did not exceed 0.25% of the operating frequency (775 kHz).

DETERMINATION OF FIELD STRENGTH LIMITS

The field strength limits shown below are found in Section 15.231.

		Frequency			Limit
F1	=	260	3750	=	L1
Fo	=	310			Lo
F2	=	470	12500	=	L2

The formula below was utilized to determine the limits:

Limit = L1 + [(Fo-F1)(L2-L1)/(F2-F1)]

Solving yields:

Fundamental Limit =5830 μV/M (AVERAGE) @ 3 Meters

Harmonic Limit = 583 μV/M (AVERAGE) @ 3 Meters

EXHIBIT D

REPORT OF MEASUREMENTS

TEST DATA

EXHIBIT D

PARAGRAPH 15.231(a)

RADIATED EMISSIONS, FUNDAMENTAL & HARMONICS

RETLIF TESTING LABORATORIES

TABULAR DATA SHEET

TEST METHOD: **FCC Part 15 Subpart C Radiated Emissions**

CUSTOMER: X-10 (USA) Inc. JOB No.: R-7482

TEST SAMPLE: Heart Pendant RF Transmitter
FCC ID:B4SHP564B

MODEL No.: HP564B SERIAL No.: N/A

TEST SPECIFICATION: FCC Part 15 Subpart C
PARAGRAPH: 15.231

OPERATING MODE: Continuously Transmiting 310 Mhz Transmitter

TECHNICIAN: Dennis Cortes DATE: March30,1998

NOTES: Test Distance: 3 Meters
Detector Function: Peak

Test Frequency	Antenna Pol./Height	EUT Orientation	Meter Reading	Correction Factor	Corrected Reading	Converted Reading		Peak Limit
MHz	(H/V) / meters	X / Y / Z	dBuV	dB	dBuV/m	uV/m		uV/m
310	H/1.4	X	76.1	-4.0	72.1	4027.2		58300
310	H/1.3	Y	77.6	-4.0	73.6	4786.3		58300
310	H/1.0	Z	78.6	-4.0	74.6	5370.3		58300
310	V/1.5	X	69.1	-4.0	65.1	1798.9		58300
310	V/1.0	Y	57.3	-4.0	53.3	462.4		58300
310	V/1.4	Z	68.6	-4.0	64.6	1698.2		58300
620	H/1.0	X	44.9	2.8	47.7	242.7		5830
620	H/1.3	Y	36.7	2.8	39.5	94.4		5830
620	H/1.0	Z	49.7	2.8	52.5	421.7		5830
620	V/1.5	X	35.6	2.8	38.4	83.2		5830
620	V/1.4	Y	49.1	2.8	51.9	393.6		5830
620	V/1.1	Z	38.0	2.8	40.8	109.6		5830
930	H/1.0	X	43.6	8.5	52.1	402.7		5830
930	H/1.3	Y	44.6	8.5	53.1	451.9		5830
930	H/1.0	Z	46.6	8.5	55.1	568.9		5830
930	V/1.4	X	39.5	8.5	48.0	251.2		5830
930	V/1.5	Y	43.2	8.5	51.7	384.6		5830
930	V/1.6	Z	41.0	8.5	49.5	298.5		5830
1240	H/1.6	X	52.9	-5.6	47.3	231.7		5000
1240	H/1.0	Y	50.8	-5.6	45.2	182.0		5000
1240	H/1.0	Z	58.3	-5.6	52.7	431.5		5000
1240	V/2.6	X	48.4	-5.6	42.8	138.0		5000
1240	V/1.3	Y	55.1	-5.6	49.5	298.5		5000
1240	V/1.5	Z	50.3	-5.6	44.7	171.8		5000
1550	H/1.3	X	51.8	-4.4	47.4	234.4		5000
1550	H/1.2	Y	47.4	-4.4	43.0	141.3		5000
1550	H/1.3	Z	54.7	-4.4	50.3	327.3		5000
1550	V/1.0	X	47.5	-4.4	43.1	142.9		5000
1550	V/1.4	Y	52.2	-4.4	47.8	245.5		5000
1550	V/1.1	Z	49.0	-4.4	44.6	169.8		5000
	The frequency range was scanned from 30 MHz to 3.1 GHz. All emissions not recorded were more than 10dB below the specified limit. Emissions from the EUT do not exceed the specified limits.							

RETLIF TESTING LABORATORIES

TABULAR DATA SHEET

TEST METHOD: **FCC Part 15 Subpart C Radiated Emissions**

CUSTOMER: X-10 (USA) Inc. JOB No.: R-7482

TEST SAMPLE: Heart Pendant RF Transmitter
FCC ID:B4SHP564B

MODEL No.: HP564B SERIAL No.: N/A

TEST SPECIFICATION: FCC Part 15 Subpart C
PARAGRAPH: 15.231

OPERATING MODE: Continuously Transmiting 310 Mhz Transmitter

TECHNICIAN: Dennis Cortes DATE: March30,1998

NOTES: Test Distance: 3 Meters
Detector Function: Peak

Test Frequency	Antenna Pol./Height	EUT Orientation	Meter Reading	Correction Factor	Corrected Reading	Converted Reading		Peak Limit
MHz	(H/V) / meters	X / Y / Z	dBuV	dB	dBuV/m	uV/m		uV/m
1860	H/1.3	X	46.1	-2.4	43.7	153.1		5830
1860	H/1.2	Y	44.3	-2.4	41.9	124.5		5830
1860	H/1.0	Z	47.4	-2.4	45	177.8		5830
1860	V/1.2	X	44.1	-2.4	41.7	121.6		5830
1860	V/1.6	Y	47.2	-2.4	44.8	173.8		5830
1860	V/1.3	Z	44.5	-2.4	42.1	127.4		5830
2170	H/1.3	X	44.8	-1.3	43.5	149.6		5830
2170	H/1.2	Y	44.6	-1.3	43.3	146.2		5830
2170	H/1.3	Z	45.4	-1.3	44.1	160.3		5830
2170	V/1.6	X	44.7	-1.3	43.4	147.9		5830
2170	V/1.2	Y	45.5	-1.3	44.2	162.2		5830
2170	V/1.3	Z	44.9	-1.3	43.6	151.4		5830
2480	H/1.0	X	*41.6	0.1	41.7	121.6		5830
2480	H/1.0	Y	*41.6	0.1	41.7	121.6		5830
2480	H/1.0	Z	*41.6	0.1	41.7	121.6		5830
2480	V/1.0	X	*41.6	0.1	41.7	121.6		5830
2480	V/1.0	Y	*41.6	0.1	41.7	121.6		5830
2480	V/1.0	Z	*41.6	0.1	41.7	121.6		5830
2790	H/1.0	X	*41.2	1.4	42.6	134.9		5000
2790	H/1.0	Y	*41.2	1.4	42.6	134.9		5000
2790	H/1.0	Z	*41.2	1.4	42.6	134.9		5000
2790	V/1.0	X	*41.2	1.4	42.6	134.9		5000
2790	V/1.0	Y	*41.2	1.4	42.6	134.9		5000
2790	V/1.0	Z	*41.2	1.4	42.6	134.9		5000
3100	H/1.0	X	*41.9	3.5	45.4	186.2		5830
3100	H/1.0	Y	*41.9	3.5	45.4	186.2		5830
3100	H/1.0	Z	*41.9	3.5	45.4	186.2		5830
3100	V/1.0	X	*41.9	3.5	45.4	186.2		5830
3100	V/1.0	Y	*41.9	3.5	45.4	186.2		5830
3100	V/1.0	Z	*41.9	3.5	45.4	186.2		5830
	The frequency range was scanned from 30 MHz to 3.1 GHz. All emissions not recorded were more than 10dB below the specified limit. Emissions from the EUT do not exceed the specified limits.							
	*=Noise Floor Measurements							

RETLIF TESTING LABORATORIES

TABULAR DATA SHEET

TEST METHOD: **FCC Part 15 Subpart C Radiated Emissions**

CUSTOMER: X-10 (USA) Inc. JOB No.: R-7482

TEST SAMPLE: Heart Pendant RF Transmitter
FCC ID:B4SHP564B

MODEL No.: HP564B SERIAL No.: N/A

TEST SPECIFICATION: FCC Part 15 Subpart C
PARAGRAPH: 15.231

OPERATING MODE: Continuously Transmiting 310 Mhz Transmitter

TECHNICIAN: Dennis Cortes DATE: March30,1998

NOTES: Test Distance: 3 Meters
Detector Function: Peak Worst Case Duty Cycle: 31.6% (-10.0 dB Duty Cycle Correction Factor)

Test Frequency	Antenna Pol./Height	EUT Orientation	Peak Corrected Reading	Duty Cycle Corr. Factor	Corrected Average	Converted Average		Average Limit
MHz	(H/V) / meters	X / Y / Z	dBuV/m	dB	dBuV/m	uV/m		uV/m
310	H/1.4	X	72.1	-10.0	62.1	1273.5		5830
310	H/1.3	Y	73.6	-10.0	63.6	1513.6		5830
310	H/1.0	Z	74.6	-10.0	64.6	1698.2		5830
310	V/1.5	X	65.1	-10.0	55.1	568.9		5830
310	V/1.0	Y	53.3	-10.0	43.3	146.2		5830
310	V/1.4	Z	64.6	-10.0	54.6	537.0		5830
620	H/1.0	X	47.7	-10.0	37.7	76.7		583
620	H/1.3	Y	39.5	-10.0	29.5	29.9		583
620	H/1.0	Z	52.5	-10.0	42.5	133.4		583
620	V/1.5	X	38.4	-10.0	28.4	26.3		583
620	V/1.4	Y	51.9	-10.0	41.9	124.5		583
620	V/1.1	Z	40.8	-10.0	30.8	34.7		583
930	H/1.0	X	52.1	-10.0	42.1	127.4		583
930	H/1.3	Y	53.1	-10.0	43.1	142.9		583
930	H/1.0	Z	55.1	-10.0	45.1	179.9		583
930	V/1.4	X	48.0	-10.0	38.0	79.4		583
930	V/1.5	Y	51.7	-10.0	41.7	121.6		583
930	V/1.6	Z	49.5	-10.0	39.5	94.4		583
1240	H/1.6	X	47.3	-10.0	37.3	73.3		500
1240	H/1.0	Y	45.2	-10.0	35.2	57.5		500
1240	H/1.0	Z	52.7	-10.0	42.7	136.5		500
1240	V/2.6	X	42.8	-10.0	32.8	43.7		500
1240	V/1.3	Y	49.5	-10.0	39.5	94.4		500
1240	V/1.5	Z	44.7	-10.0	34.7	54.3		500
1550	H/1.3	X	47.4	-10.0	37.4	74.1		500
1550	H/1.2	Y	43.0	-10.0	33.0	44.7		500
1550	H/1.3	Z	50.3	-10.0	40.3	103.5		500
1550	V/1.0	X	43.1	-10.0	33.1	45.2		500
1550	V/1.4	Y	47.8	-10.0	37.8	77.6		500
1550	V/1.1	Z	44.6	-10.0	34.6	53.7		500

The frequency range was scanned from 30 MHz to 4.18 GHz. All emissions not recorded were more than 10dB below the specified limit. Emissions from the EUT do not exceed the specified limits.

RETLIF TESTING LABORATORIES

TABULAR DATA SHEET

TEST METHOD: **FCC Part 15 Subpart C Radiated Emissions**

CUSTOMER: X-10 (USA) Inc. JOB No.: R-7482

TEST SAMPLE: Heart Pendant RF Transmitter
FCC ID:B4SHP564B

MODEL No.: HP564B SERIAL No.: N/A

TEST SPECIFICATION: FCC Part 15 Subpart C PARAGRAPH: 15.231

OPERATING MODE: Continuously Transmiting 310 Mhz Transmitter

TECHNICIAN: Dennis Cortes DATE: March30,1998

NOTES: Test Distance: 3 Meters
Detector Function: Peak Worst Case Duty Cycle: 31.6% (-10.0 dB Duty Cycle Correction Factor)

Test Frequency	Antenna Pol./Height	EUT Orientation	Peak Corrected Reading	Duty Cycle Corr. Factor	Corrected Average	Converted Average		Average Limit
MHz	(H/V) / meters	X / Y / Z	dBuV/m	dB	dBuV/m	uV/m		uV/m
1860	H/1.3	X	43.7	-10.0	33.7	48.4		583
1860	H/1.2	Y	41.9	-10.0	31.9	39.4		583
1860	H/1.0	Z	45.0	-10.0	35.0	56.2		583
1860	V/1.2	X	41.7	-10.0	31.7	38.5		583
1860	V/1.6	Y	44.8	-10.0	34.8	55.0		583
1860	V/1.3	Z	42.1	-10.0	32.1	40.3		583
2170	H/1.3	X	43.5	-10.0	33.5	47.3		583
2170	H/1.2	Y	43.3	-10.0	33.3	46.2		583
2170	H/1.3	Z	44.1	-10.0	34.1	50.7		583
2170	V/1.6	X	43.4	-10.0	33.4	46.8		583
2170	V/1.2	Y	44.2	-10.0	34.2	51.3		583
2170	V/1.3	Z	43.6	-10.0	33.6	47.9		583
2480	H/1.0	X	*41.7	-10.0	31.7	38.5		583
2480	H/1.0	Y	*41.7	-10.0	31.7	38.5		583
2480	H/1.0	Z	*41.7	-10.0	31.7	38.5		583
2480	V/1.0	X	*41.7	-10.0	31.7	38.5		583
2480	V/1.0	Y	*41.7	-10.0	31.7	38.5		583
2480	V/1.0	Z	*41.7	-10.0	31.7	38.5		583
2790	H/1.0	X	*42.6	-10.0	32.6	42.7		500
2790	H/1.0	Y	*42.6	-10.0	32.6	42.7		500
2790	H/1.0	Z	*42.6	-10.0	32.6	42.7		500
2790	V/1.0	X	*42.6	-10.0	32.6	42.7		500
2790	V/1.0	Y	*42.6	-10.0	32.6	42.7		500
2790	V/1.0	Z	*42.6	-10.0	32.6	42.7		500
3100	H/1.0	X	*45.4	-10.0	35.4	58.9		583
3100	H/1.0	Y	*45.4	-10.0	35.4	58.9		583
3100	H/1.0	Z	*45.4	-10.0	35.4	58.9		583
3100	V/1.0	X	*45.4	-10.0	35.4	58.9		583
3100	V/1.0	Y	*45.4	-10.0	35.4	58.9		583
3100	V/1.0	Z	*45.4	-10.0	35.4	58.9		583
	The frequency range was scanned from 30 MHz to 4.18 GHz. All emissions not recorded were more than 10dB below the specified limit. Emissions from the EUT do not exceed the specified limits.							
	*=Noise Floor Measurements							

Equipment List

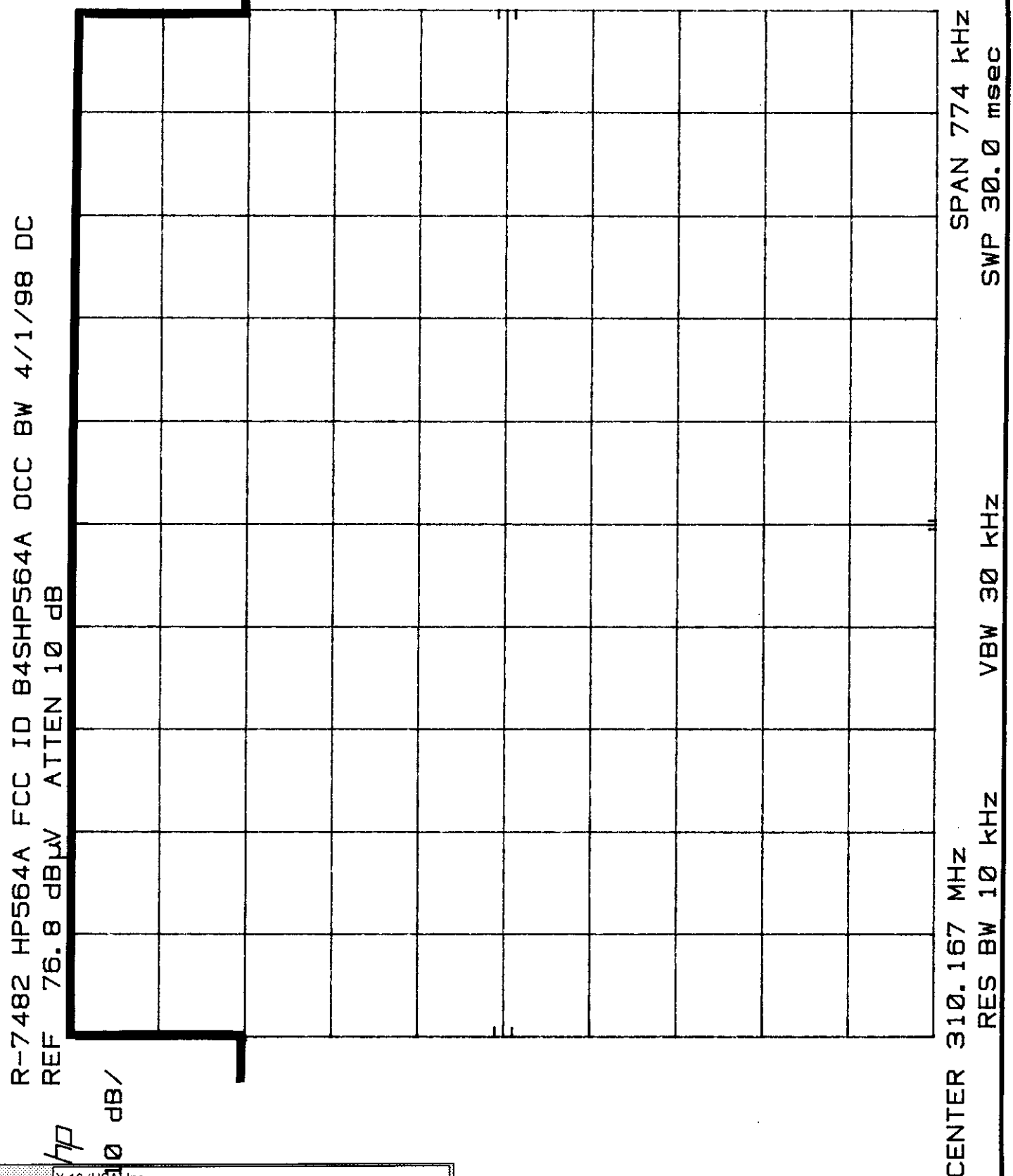
FCC 15.231 Radiated Emissions

EN	Type	Manufacturer	Frequency Range	Model No.	Serial No.	Cal Date	Due Date
067	Open Area Test Site	Retlif	3 Meter	RNY	001	8/30/97	8/30/99
128C	Double Ridge Guide	Eaton Corporation	1 GHz - 18 GHz	96001	2385	10/6/97	10/6/98
133	Broadband Pre-Amplifier	Electro-Metrics	10 kHz - 1 GHz, 26dB	BPA-1000	174	6/20/97	6/20/98
141	Spectrum Analyzer	Hewlett Packard	100 Hz - 40 GHz	8566B	2637A03491	3/2/98	9/2/98
141A	Graphics Plotter	Hewlett Packard	N/A	7470A	2517A07605	3/4/98	3/4/99
141B	Quasi-Peak Adaptor	Hewlett Packard	100 Hz - 1 GHz	85650A	2521A00862	3/3/98	9/3/98
206B	6.0 dB Attenuator	Texscan	0 - 1.0 GHz	FP-50 - 6 dB	5785	6/20/97	6/20/98
523	Biconilog	Electro-Mechanics	26 MHz - 1100 MHz	3143	9602-1234	9/30/97	9/30/98
543	Preamplifier	Hewlett Packard	1.0 GHz - 26.5 GHz	8449B	3008A00829	8/12/97	8/12/98

EXHIBIT D

PARAGRAPH 15.231(c)

OCCUPIED BANDWIDTH



Customer:	X-10 (USA) Inc.
Test Sample:	Heart Pendant RF Transmitter
Model No.:	HP564B FCC ID:B4SHP564B
Test Method:	FCC 15.231(c) Occupied Bandwidth
Notes:	The Bandwidth of the emission is not wider than .25% of the Center Frequency 20dB down from the modulated carrier

Date:	March 31,1998	Tech:	Dennis Cortes	Sheet	1	of	2

Retlif Testing Laboratories

Report No. R-7482

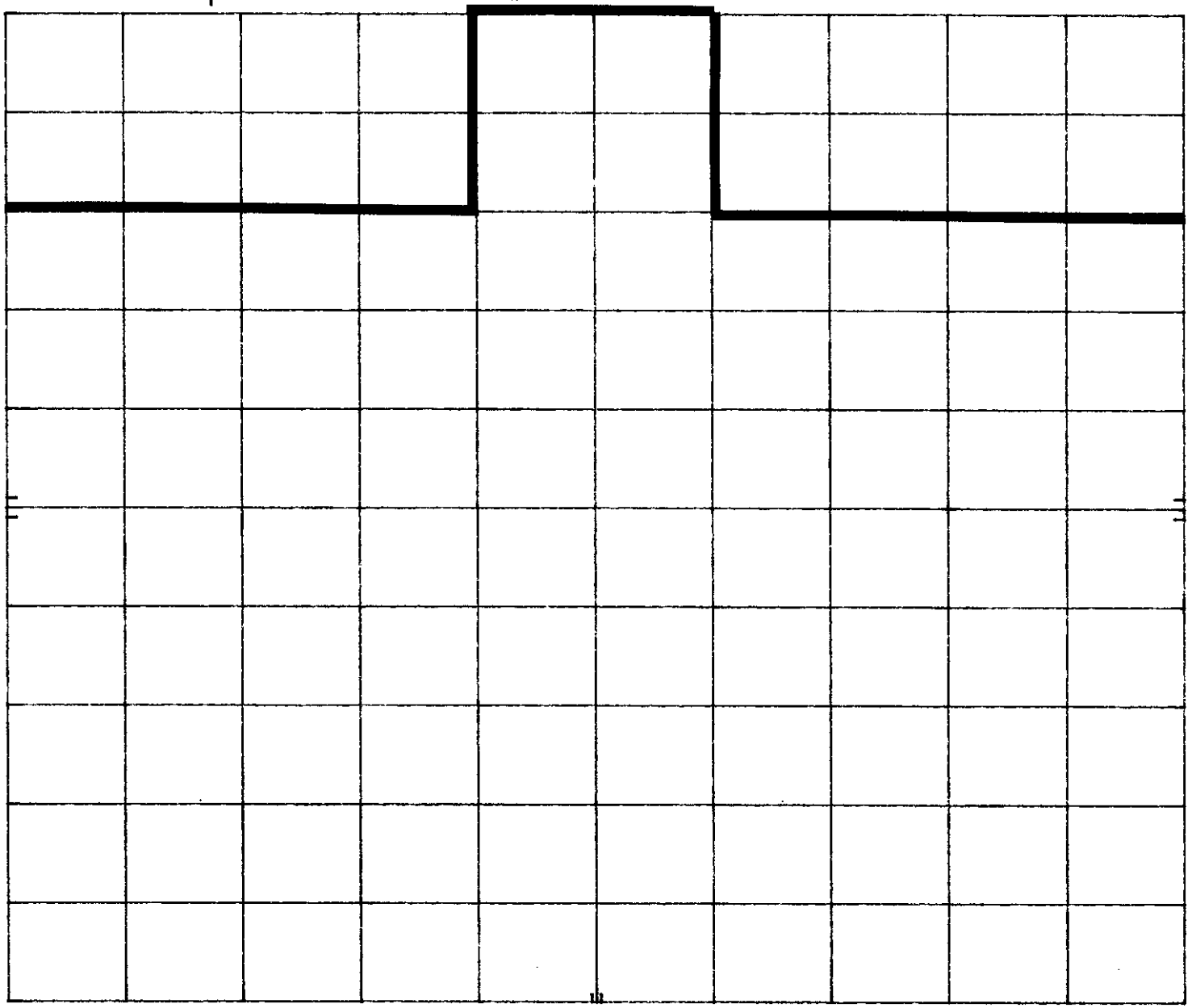
Customer:	X-10 (USA) Inc.
Test Sample:	Heart Pendant RF Transmitter
Model No:	HP564B FCC ID:B4SHP564B
Test Method:	FCC 15.231(c) Occupied Bandwidth
Notes:	The Bandwidth of the emission is not wider than .25% of the Center Frequency 20dB down from the modulated carrier

Date:	Tech.	Sheet	of
March 31,1998	Dennis Cortes	2	2

R-7482 HP564A FCC ID B4SHP564A OCC BW 4/1/98 DC

REF 77.0 dBµV ATTEN 10 dB

10 dB/



CENTER 310.23 MHz SPAN 3.87 MHz

RES BW 10 kHz VBW 30 kHz SWP 116 msec

Retlif Testing Laboratories

Report No. R-7482