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26 March 2008

American TCB
6731 Whittier Avenue
McLean VA 22101

RE: GE Security
Response to 03-25-08 Comments

FCC ID:

In response to your comments on the above submittal:

1. ATCB Comments: Please note that the FCC does not recognize EN55022 test data nor methods for intentional radiators. Please note that a number of data tables and plots show EN55022 as test data and method. Please show compliance to the appropriate 15C required test requirements

   RESPONSE: Revised Report has been uploaded.

2. ATCB Comments: Please note that laboratories are to verify the duty cycle for 15.231 devices. Please either explain why such data cannot be verified or please provide plots showing the measured duty cycle used in the data (i.e. the 122us pulses and the 366us pulse in max usage configuration). Please use 15.35(c) and ANSI C63.4 to test and verify the appropriate duty cycle.

   RESPONSE: Expanded View of Packet exhibit plus 100mS plot and a 1 Sec. Plots have been uploaded.

3. ATCB Comments: Please note that test labs are to verify the 5 second shut off requirement when possible. Please either explain why the 5 second shutoff is not possible to be measured, or please provide data showing the 5second shutoff requirement has been met by the device.

   RESPONSE: Expanded View of Packet exhibit has been uploaded.

4. ATCB Comments: The device appears to contain user installable software capabilities. Please provide evidence as to how the device prevents 3rd party software usage, or please explain how the manufacturer controls 3rd party software usable by the device. Please explain how the appropriately supplied manufacturers software cannot make the device operate such as to violate the requirements of 15.231. (i.e. explain how the software does not and cannot increase the 5 second shutoff requirement, how the software does not and cannot increase the duty cycle beyond that shown and verified per item 2 above. Please address all aspects of the requirements and limitations of 15.231 and how the software cannot be used to violate these limitations etc.).

   RESPONSE: From the client: "I am not sure what he is talking about here, this control panel or any of our products are NOT "user installable". They have user interface capabilities, i.e. turning functions On or Off, and learning in sensors. The things that they are talking about (5 second shutoff and duty cycle) are hard coded into the micro, they CAN NOT be changed or manipulated by any 3rd party."

5 & 5. ATCB Comments: Please explain how or if the device meets the 2 second per hour requirement of 15.231(a)(3). Please verify that the device does not transmit data except in conjunction with a control signal per 15.231(a).

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RESPONSE: From the client: The device does not transmit unless it is asked to by a two way device i.e. our two way talking touch pad. When that occurs the time of transmission is 22.2mS per packet, we send at a maximum of 8 packets per transmission. which is well below 2 sec.

The above referenced documents have been uploaded to the website at the same time as this response.

Please let us know if anything further is required.

Susan L Rupp

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