

dward

From: Rupp, Susan [SRupp@tuvam.com]
Sent: 03/27/2008 9:45 AM
To: dward@atcb.com
Subject: FW: ATCB006073 | B4Z-910C-SIMON | | B4Z-910C-SIMON_ATCB006073
Importance: High

Hi Dennis

Please see the explanation below regarding your issue with this product and the manual statement you are questioning.

Does this sufficiently address this issue?

Sue

From: Nelson, Kenneth L (GE EntSol, Security) [mailto:KenL.Nelson@ge.com]
Sent: Thursday, March 27, 2008 11:41 AM
To: Rupp, Susan
Subject: RE: ATCB006073 | B4Z-910C-SIMON | | B4Z-910C-SIMON_ATCB006073

4. The statement that is being referred to, has to deal with a piece of software that is called a "Downloader", which is not sold or packaged with this product. That software is installed on a computer, not the Simon XT. The "Downloader" is used like a user interface to turn On or Off functions, phone numbers, learn in sensors ect. from offsite. It can no way be used to change, or manipulate anything with the transmitter, i.e. duty cycle, ON time, 5 second shut off. The Simon XT does not have Software, it has Firmware. Since the Simon XT has a downloader feature, the statement is in the manual to insure the installers know about the Software License for the downloader.

Ken

From: Rupp, Susan [mailto:SRupp@tuvam.com]
Sent: Thursday, March 27, 2008 9:27 AM
To: Nelson, Kenneth L (GE EntSol, Security)
Subject: FW: ATCB006073 | B4Z-910C-SIMON | | B4Z-910C-SIMON_ATCB006073
Importance: High

Hi Ken

Please comment below from the reviewer and information contained in your manual.

Sent: Wednesday, March 26, 2008 6:06 PM
To: Rupp, Susan

Hi Susan

In reference to item 4 – please see page 2 section 2 under 'license' where it states "You may: a. install and use the Software on a single Machine at one time, unless You have purchased additional copies of the Software, in which case You may install the software on the number of Machines for which You have purchased copies of the Software; b. use the original copy of the Software provided to You for backup purposes." Clearly this indicates

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that the user/purchaser of the system can install software. Please now look at page 3 under 'limited warranty' where it states "Except as specifically provided therein, any other software and any hardware furnished with or accompanying the Software is not warranted by GE SECURITY." This indicates that there is a possibility of the user/owner having the ability of installing 3rd party software. How does this affect the operation of the device? What does the typical software control and how is it used so as not to modify the parameters of the device so that the requirements of 15.231 are not made to be non-compliant?

If there is no possibility of other than the software provided by the manufacturer and supposedly installed by the manufacturer, then why is this in the manual?

The device software und NO condition can be such that it can make the device operate outside the requirements of 15.231.

Thanks.

Sent: Tuesday, March 25, 2008 2:22 PM

To: Murphy, Jolene; Rupp, Susan; Schneider, Joel

Regarding www.AmericanTCB.com application:

ATCB ID: ATCB006073

FCC ID: B4Z-910C-SIMON

IC:

TCF:

Account name: TUVslr

Hi Susan

A couple comment on this application. Please address these concerns.

- 1 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
- 2 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.
- 3 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.
- 4 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.).

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

Thanks

Dennis Ward