

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

SEP 1 1994

IN REPLY REFER TO:

31030/EQU/4-2-4  
1300B4

Mr. Valdis V. Liepa  
University of Michigan  
Radiation Laboratory  
NASA/Center for Space Terahertz Technology  
3228 EECS Building  
Ann Arbor, MI 48109-2122

Dear Mr. Liepa:

This is in reply to your facsimile transmission of August 2, 1994, regarding the labelling of a low power communication device that will be marketed within the U.S. and Canada. You request approval to combine the labels for both countries, permitting a single label to be employed. As indicated, this combined label would read as follows:

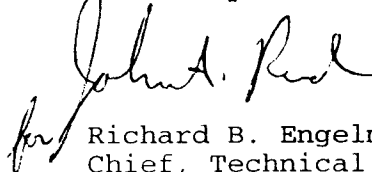
"This device complies with Part 15 of the FCC Rules and with RSS-210 of the Industry Canada. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation."

According to Section 15.19(a) of our rules, a low power communications device operating under Part 15 must be labelled with the specific statement contained in paragraph (a)(3). The only difference between the statement required under our rules and your proposed statement is the addition in the first sentence of the phrase "... and with RSS-210 of the Industry Canada."

I note that Kwai Lum of Industry Canada, in a facsimile to you on August 3, 1994, has already given permission to use this combined label. I also agree that the use of this combined label, as shown above, is acceptable under our regulations. This label conveys the desired information and is essentially identical to our requirement. As expressed by Mr. Lum, text denoting compliance with the standards for both countries was not stated in our rules as "it would be too presumptuous [to assume] that all products are for both markets."

I trust that the above responds to your inquiry. Additional questions should be directed to John Reed, 1300B4, at the address on the letterhead or at (202) 653-7313.

Sincerely,



for Richard B. Engelman  
Chief, Technical Standards Branch  
Office of Engineering and Technology

Government of Canada  
Industry Canada

Gouvernement du Canada  
Industrie Canada

FACSIMILE SHEET

FORMULE D'ENVOI PAR TELECOPIEUR

TO/A: Name/Nom.....: Mr Valdis V. Liepa  
Office/Bureau.: Radiation Lab, University of Michigan, USA  
Tel. No./No. de tél.: Fax: 313-747-2106

FROM/DE: Name/Nom.....: Kwai Lum  
Manager, Radio Equipment Standards,  
300 Slater Street, 13th Floor,  
Ottawa, Canada, K1A 0C8  
Phone: 613-990-4699; Fax: 613-952-5108

Total pages : Date & time sent: August 3, 94.  
Pages totales: 1 Date & heure envoyé:

Our Ref : DGEP-5630-1 (RSS-210 Labelling)

This is to respond to your fax of August 1, 94 requesting that we permit a combined statement for FCC and Industry Canada on the equipment labels.

We wish to assure you that your suggested combined label that you submitted in your fax is acceptable to Canada since our standard (section 5.8 of RSS-210) allows (to quote) ".....equivalent statement.....".

We have made our labelling statement as close as we can to Part 15.19(3); the differences are : we left out the word "harmful" because of difficulties in defining what is harmful. We added the phrase "of the device" to remove any possible misunderstanding.

To re-capitulate, although your proposed statement uses FCC text except for the mention of "RSS-210 of Industry Canada", we consider it to be equivalent. Our preferred text is per RSS-210; the next best is to add the word "harmful" to meet FCC requirements.

Since FCC and Industry Canada are from different countries, we do not consider it necessary to state in our separate standards a combined text. In any case it would be too presumptuous that all products are for both markets.

Our equipment certification staff will be informed of the above. We will also copy this to Mr Reed of the FCC since you said that you sent a similar fax to him.

Regards,



Kwai Lum

cc Mr John Reed (FCC OET fax 202-653-8773).  
cc R. Corey (Equipment Certification).

Re: Certification of JCI Transmitter  
Model: RSCMTC  
FCC ID: CB2RSCMTCHL3  
CANADA: to be provided

POWER OF ATTORNEY

A letter granting Valdis V. Liepa the Power of Attorney is on file and can be provided when so requested.

Re: Certification of JCI Transmitter  
Model: RSCMTC  
FCC ID: CB2RSCMTCHL3  
CANADA: to be provided

REQUEST FOR CONFIDENTIALITY

Pursuant to 47 CFR 0.459, Johnson Controls, Inc. requests that a part of the subject application be held confidential. This comprises Exhibits

and           (5)       Schematics  
              (10)      Parts List/Tune-up Information

JCI has spent years in developing this product and it is one of the major product lines for the company. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will definitely result in a financial hardship.

If there are any questions regarding this request, please contact me at the above address or call 647-647-1792, (lab) 734-483-4211, fax 647-647-2106 or e-mail liepa@umich.edu.

Sincerely,

Valdis V. Liepa  
Research Scientist  
University of Michigan

Re: Certification of JCI Transmitter  
Model: RSCMTC  
FCC ID: CB2RSCMTCHL3  
CANADA: to be provided

PRODUCT INFORMATION

The product for which the certification is pursued has been designed by:

Johnson Controls, Inc.  
Automotive Systems Group  
915 E. 32nd Street  
Holland, MI 49423

Contact:  
Mark Jacob  
Project Engineer  
Tel: (616) 394-8517 Fax: (616) 394-6100

The product will be manufactured by:

Jabil Circuits, Inc.  
1700 Atlantic Blvd.  
Auburn Hills, MI 48326  
Tel: (248) 391-5300 Fax: (248) 391-5317

Contact:  
Carl Shearer  
Tel: (616) 394-6465 Fax: (616) 394-8499  
Electronics Manufacturing Engineer

The product will be marketed and serviced by:

Automobile Dealers  
and  
Johnson Controls, Inc.

FISH & RICHARDSON P.C.

FISH RICHARDSON & NEAVE  
BOSTON  
(1916-1968)

FREDERICK P. FISH  
(1855-1930)

W. K. RICHARDSON  
(1838-1951)

601 THIRTEENTH STREET, N.W.  
WASHINGTON, D.C. 20005

TELEPHONE: 202/783-5070  
FAX: 202/783-2331

BOSTON  
617/542-5070

HOUSTON  
713/629-5070

SILICON VALLEY  
415/322-5070

TWIN CITIES  
612/335-5070

SOUTHERN CALIFORNIA  
619/678-5070

June 1, 1995

Our File: 05238/002001

BY FACSIMILE  
(301) 344-2050

Mr. Edward Gibbons  
Equipment Authorization Branch  
FCC Laboratories  
7435 Oakland Mills Road  
Columbia, MD 21046

**DRAFT**

ANSI C63.4 Test Procedures for  
Universal Garage Door Opener

Dear Ed:

This is to follow up our telephone conversation on May 12, 1995, regarding the appropriate test procedures for a "universal" garage door opener (UGDO) currently under development by Prince Corporation of Holland, Michigan. Like the earlier version of the UGDO (see my letters to you of July 20, 1992 and April 13, 1993), Prince's new model is designed solely for installation in motor vehicles.

By way of background, the UGDO is capable of learning the frequency and coding scheme (duty cycle) of most garage door openers on the market. The new model is designed to operate between 220 and 440 MHz and uses a single variable oscillator to learn/receive as well as to transmit.<sup>1/</sup> The frequency and duty cycle information are stored in one of three "memory banks." The UGDO is programmed to "ignore" door openers in the restricted bands per Section 15.205 of the Commission's rules.

---

<sup>1/</sup> A VCO used to transmit is also used to learn/receive via a mixing circuit when a manual switch is held by the user. The device is programmed to search first for known door opener frequencies before going through the band on a single step basis. Ordinarily, it takes approximately 20 seconds to "lock in" and record the frequency. Under worst case conditions, however, the device could require 90 seconds to learn. All transmissions cease immediately as soon as the manual switch is released.

Mr. Edward Gibbons  
June 1, 1995  
Page 2

The UGDO is designed to adjust its power output dynamically, based on the duty cycle and frequency of the "learned" device. First, the UGDO detects the duty cycle of the learned device in the same "worst case" manner as prescribed under Commission rules. This duty cycle is then sorted into one of 32 ranges and a digital attenuator adjusts the output power of the device accordingly. If the UGDO detects a device with a duty cycle above 75%, the UGDO will not operate.

For each range, the output power of the UGDO is adjusted, based on the highest duty cycle in the range. Thus, for example, a transmitter whose duty cycle is in the middle of a range would have its power adjusted as if it were operating at the top of the range. In this way, the UGDO will always be trained to operate at power levels that are below the limits prescribed in the Commission rules. A second output power adjustment is then performed by the UGDO, based on the frequency of the learned unit. This adjustment is to correspond with the interpolated field strength limits set forth in Section 15.231 of the rules.

During our discussion, you agreed that the test procedures for the new UGDO would follow the same "3 sample" scheme which we had devised for the initial UGDO, as follows:

1. Sample 1, preset to transmit (CW) at 220 MHz, 330 MHz and 440 MHz, all set to operate at the highest duty cycle (estimated to be 72%);
2. Sample 2, preset to transmit (CW) at 220 MHz at the lowest duty cycle, 330 MHz at a 50% duty cycle and 440 MHz also at the lowest duty cycle; and
3. Sample 3, preset at the highest duty cycle and supplied with door opener using a low duty cycle for the purpose of demonstrating the UGDO's learn capability and dynamic output adjustment.

We also discussed a needed modification in the original test procedures. Specifically, you agreed that it would be permissible for Prince to use a 2 wire "harness" connected to the device, with the UGDO located in the center of the turntable. The wiring harness would be run approximately 1/2 meter to the longest edge of the turntable and then straight down to the battery. This test configuration will simplify testing for

Mr. Edward Gibbons  
June 1, 1995  
Page 3

Prince by providing repeatable results that reflect actual operating conditions.

I trust the foregoing accurately sets forth the elements of our discussion. Prince would appreciate it, therefore, if you could indicate your agreement by written response. Thank you in advance for your prompt attention to these issues.

Very truly yours,

Terry G. Mahn

/bab

cc: Prince Corporation

45761.W11



# FEDERAL COMMUNICATIONS COMMISSION



Customer Service Branch  
7435 Oakland Mills Road, Columbia, MD 21046  
Phone: (301) 725-1585, ext 229 Fax (301) 344-2050  
FROM: Ed Gibbons DATE: June 13, 1995  
TO: Mr. Terry G. Mahn / Fish & Richardson  
PAGES: One  
REFERENCE: Your fax dated 6/9/95  
FAX NUMBER: 202-783-2331

---

Dear Terry,

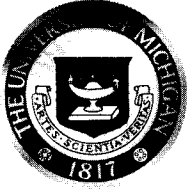
I have reviewed the information in your fax regarding the proposed test procedure for the new universal garage door opener (UGDO) currently under development by Prince Corporation. The "three sample" test scheme you describe is satisfactory with the following caveat. The proposal to place the UGDO in the center of the test table, and to drape the 2-wire harness across the table and down to the power supply (without cable manipulation) is acceptable as long as the harness does not contain an antenna.

As stated in Section 13.1.4.1 of measurement procedure C63.4-1992, "If the EUT is equipped with or uses an adjustable antenna, the EUT antenna shall be manipulated through typical positions and lengths during preliminary testing to maximize emission levels." Applying this requirement to the subject device, if the harness contains an antenna, it will be necessary to manipulate the harness position to maximize the radiated emission levels. Such manipulation may be performed with the power supply (battery) placed below the test table. No tests will be required with the battery on the table.

If the selected harness length is not sufficient to permit cable manipulation with the UGDO placed in the center of the table, the harness length should be increased for this test. Alternatively, the UGDO may be moved around on the table, i.e., moved toward the edge of the table to provide enough slack in the cable for "some" manipulation. We can discuss this issue further if you desire.

If you have any additional questions, please do not hesitate to contact me.

BTB  
JUN 13 1995



THE UNIVERSITY OF MICHIGAN

COLLEGE OF ENGINEERING

THE RADIATION LABORATORY  
DEPARTMENT OF ELECTRICAL ENGINEERING  
AND COMPUTER SCIENCE

3228 EECS BUILDING  
ANN ARBOR, MICHIGAN 48109-2122 USA  
313 764-0500 FAX 313 747-2106

February 7, 2000

Re: Certification of JCI Transmitter  
Model: RSCMTC  
FCC ID: CB2RSCMTCHL3  
CANADA: to be provided

STATEMENT OF MODIFICATIONS

There were no modifications made to this DUT by this laboratory. (Also see Section 3.1 of the Test Report).

---

Valdis V. Liepa  
Research Scientist