

Tim,
You wrote:

- >The block diagram should show the frequencies of all oscillators
- >in the TX portion of the device (CFR 2.1033(a)(5)), unless this portion
- >of the device is an OEM part from a different manufacturer. Please
- >provide either the block diagram for the TX portion, or alternatively
- >provide a parts list that shows that this part is provided by another
- >manufacturer. Please update the list of confidential exhibits if
- >necessary.

I Reply:
PLEASE SEE ALL THE ATTACHED FILES.
PLEASE SEE REVISED BLOCK DIAGRAM: EXHIBIT 2-2A

- >Please provide top and bottom photos of all boards within the device.
- >The back of one board does not appear to have been provided (external
- >interface board). It appears that also the TX circuitry may actually be
- >contained on a small daughter board, but can not fully be determined
- >from photos provided. If so, please provide close up top/bottom photos
- >of this board before it is integrated onto the main board.

PLEASE SEE REVISED INTERNAL PHOTO: EXHIBIT 4-4A ADDITIONAL CLOSE UP OF THE TRANSMITTER AND RECEIVER ON THE MAIN CIRCUIT BOARD, AND FRONT & BACK PHOTOS OF THE DC POWER SUPPLY INTERFACE "DAUGHTER BOARD"

- >FCC desires actual test photographs and not simply a test diagram.
- >Please provide test configuration photographs on the test site if
- >available.

PLEASE SEE REVISED TEST PHOTO EXHIBIT 5-2A

- >The OAT's facility does not appear to be currently listed on the
- >FCC site. Please explain. Page 2 February 13, 2006

THE OAT'S SITE WAS CURRENT UP UNTIL ONE WEEK AGO WHEN WE SUBMITTED A RENEWAL TO THE FCC I EXPECT A NEW SITE CERTIFICATION LETTER ANY DAY. THE SITE WAS CURRENT WITH THE FCC WHEN THE DATA WAS TAKEN.

- >Test report references ANSI C63-4 - 1992. Please note that the FCC
- >rules now only reference ANSI C63.4 - 2003 edition. Please ensure
- >testing is in compliance with this version and correct exhibits as
- >necessary. Note that for many measurements, this version now requires
- >VBW must be 3*RBW.

PLEASE SEE REVISED EMISSIONS EXHIBIT 5-3A , THE REFERENCE TO '1992' WAS AN
OVERSIGHT, WE ARE TESTING TO ANSI C63.4 - 2003 AND HAVE THE CURRENT HARD
AND ELECTRONIC COPY'S IN OUR TEST FACILITY.

- >FYI....Reading at 2760 MHz appears to fall in a restricted band and
- >therefore the incorrect limits were applied. However it still meets
- >restricted band limits.

PLEASE SEE REVISED EMISSIONS EXHIBIT 5-3A , AGAIN AN OVERSIGHT THE LIMIT WAS REVISED TO THE RESTRICTED BAND LIMIT.

- >Please explain section 5-5. All measurements appear to be the same value.

EXHIBIT 5-5 IS CORRECT AS SHOWN THIS IS THE NOISE FLOOR OF THE MEASURING EQUIPMENT. THE RECEIVER IS EXTREMELY QUIET.

- >All measurements (spurious and digital device) appear to be reported
- >for Horizontal polarity only. It is highly unusual for all spurious
- >to occur worse case in the same orientation. Were emissions also
- >measured for Vertical polarity?

THIS IS CORRECT, WE USE A ETS BICONOLOG ANTENNA WITH VERY GOOD VERTICAL TO HORIZONTAL ISOLATION. VERTICAL POLARITY READINGS WERE ALSO MADE, BUT WE ONLY REPORTED THE HIGHEST / WORSE CASE - WHICH JUST HAPPENED TO BE ALL HORIZONTAL THIS TIME. WE HAVE HAD OTHER PRODUCTS THAT SHOW ALL VERTICAL WORSE CASE AND SOME WHICH SHOW SOME OF BOTH THIS IS NORMAL WITH OUR PRODUCTS.

- >How is this device powered. If it receives power from AC, or from
- >another device that receives AC, or by and AC to DC connection, then
- >AC power line emissions testing per 15.207 should also be provided.

THIS DEVICE IS POWERED BY A 15 VAC WALL TRANSFORMER AND A BACKUP BATTERY. PLEASE SEE EXHIBIT 5-6 'CONDUCTED EMISSIONS' PLEASE NOTE: THIS TEST WAS DONE EARLIER IN THE DEVELOPMENT CYCLE THAN THE FCC TESTING BECAUSE IT WAS DONE BY OUR QC DEPARTMENT AT THE SAME TIME AS UL WAS.

- >It can not be determined if all ports of the device were adequately
- >filled per ANSI C63.4. Please explain.

ALL PORTS WERE PROPERLY TERMINATED DURING THE CONDUCTED EMISSIONS TESTING BY QC.

- >The device appears to use 3 modes of signaling. 1) Alarm, 2) Keypad-
- >control signals, 3) confirmation forwarding signals from remotes.

While

- >timing information was supplied, it is uncertain if it applies to all
- >modes of signaling, or if any additional modes also exist. Please

explain

- >any additional modes of signaling as well as provide information for
- >compliance to 15.231 (a)(4) or 15.231(a)(1)/(2) as applicable for

each

- >mode. Please explain applicability or compliance of 15.231(a)(3).

- >Please explain applicability or compliance of 15.231(a)(5).

- >Are all signaling types/packets meet the same timing requirements as
- >shown. Please explain.

THERE IS ONLY ONE TYPE OF TRANSMISSION THAT IS USED FOR ALL SIGNALING. THIS WAS DESCRIBED IN EXHIBITS 3-1 AND 3-2. ONLY THE ACTUAL COMBINATION OF DATA BITS VARIES BETWEEN ALARM, CONTROL AND CONFIRMATION SIGNALS.

COMPLIANCE TO 15.231 (a)(4) AND / OR 15.231(a)(1)/(2) IS EXPRESSED IN THE DUTY CYCLE CALCULATION, ((3-1)) WHERE WE AVAIL OURSELVES OF THE DUTY CYCLE CORRECTION PROVISION. I.E.;

$$25644.8 \text{ uV/M} \times 15.0\% = 3846.7 \text{ Uv/M FCC LIMIT: } 7292 \text{ Uv/M @}$$

3M

WE DO ALL OUR TRANSMISSIONS THIS WAY SO AS TO MAKE THE DUTY CYCLE AS LOW AS PRACTICAL TO THE MAXIMUM FCC ALLOWED CORRECTION OF 10% ALL OF OUR DEVICES ARE MOMENTARY OPERATION DEVICES.