

TCB Q&A

Question:

Under 15.231(a) (3): Periodic transmissions at ***regular predetermined intervals are not permitted***. However, polling or supervision transmissions, including data, to determine system integrity of transmitters used in security or safety applications are allowed if the total duration of transmissions does not exceed more than two seconds per hour for each transmitter. There is no limit on the number of individual transmissions, provided the total transmission time does not exceed two seconds per hour.

In the operational description it describes an automatic mode:

Automatic mode allows you to control the end-products assigned to the channels on the remote control transmitter automatically, after having created the **weekly and daily programs**, called "automatic orders". Up to 6 automatic orders can be programmed for each day of the week.

Please explain why transmissions under this automatic mode are not considered "***regular predetermined intervals***" and why the device is considered appropriate for operation under 15.231(a).

Answer:

1) Following a conference call with Joe Dichoso (FCC) on 14 September 2011, it was determined that our product is not considered a periodic transmitter but an automatic transmitter and so 15.231(a) is applicable for the automatic mode of operation.

Functional description: Automatic mode allows you to control the end-products assigned to the channels on the remote control transmitter automatically, after having created the weekly and daily programs, called "automatic orders". Up to 6 automatic orders can be programmed for each day of the week, and these orders are executed once a week. In this case, the product is not considered Periodic but Automatic

- **Automatic transmission:** a transmission set by the End User or installer The Settings parameters could be the time of transmission and the time between transmission with a regular time or not (Example : the settings for a timer : from Monday to Friday, Open order at 8AM and closed order at 7PM, and for the Week End, the open order at 10AM and closed order at 10 PM).
- **Periodic transmission:** a transmission with regular time, and in this case the parameters can't be modified by the end-user or installer (e.g. a transmission every 30min to indicate the integrity of a safety system)