



American Telecommunications Certification Body Inc.  
6731 Whittier Ave, McLean, VA 22101

September 18, 2007

RE: Visonic Inc.

FCC ID: GSA5-BTC00433

After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

- 1) Due to various concerns recently seen about proper authority being given to others for FCC and/or IC matters, the agency letter (and ideally confidentiality letters as well) should be signed by someone traceable to have the proper authority. For instance, the FCC site shows Scott Jensen as the correct contact of authority for FCC matters. Therefore the agency letters should be signed by this contact or alternatively a letter showing who he has "deputized" (i.e. Michael Wasserstein) to sign on his behalf may be provided as well.
- 2) FYI....The device does not appear to be subject to DoC requirements under 15.101 and therefore should not be labeled as such. For instance, the device does not appear to be a PC peripheral and the RX portion of the device is outside 30 – 960 MHz range regulated by Part 15.
- 3) Page 3 of the users manual cites motion RF transmissions are every 7.5 sec. This is less than the minimum measured and allowed in 15.231 (10 sec. min. and/or 30\* duration of transmission).
- 4) The information presented in Table 7.1.2 appears to be for motionless RF transmissions (manual says these are approx. 2 msec in duration). How about the motion transmissions. The manual cites these are 400 msec. Please provide appropriate test data for this condition.
- 5) 400 msec transmit duration would also affect duty cycle correction factor. Please adjust. Note that compliance may be affected depending on the worse case results of the duty factor.
- 6) Tamper conditions shows transmissions beyond the 1 second (1.412 second duration for the series of transmissions).
- 7) Please explain why the fundamental in plot 7.2.3 appears higher than reported anywhere else – including the data tables.

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Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.