



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

March 15, 2005

RE: Visonic Ltd.

FCC ID: GSAMCTIIR252

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) Even if the assist may be used for security and safety applications, if it is not considered an immediate emergency, then transmissions beyond 5 seconds would not be allowed. According to FCC rules, only emergency conditions are allowed to exceed the 5 second rule. To cite an example that defines the FCC's concern, please reference the following:

A manufacturer developed various health and safety gas alarm detectors for home use. One of these detected Radon while another was Carbon Monoxide. The Carbon Monoxide version was allowed to TX for the pendency of the alarm since this gas can cause death and was therefore considered an emergency. The Radon detector was not allowed to TX beyond 5 seconds, even though Radon is considered a Health hazard. This is based upon the fact that it is not an emergency condition (even though Radon affects health).

Given our training, past experience and example cited above I am not convinced that the assist and user defined features meet with emergency conditions allowable under 15.231. To proceed forth considering these modes acceptable for > 5 seconds of TX will require a confirmation from the FCC. Does your client have anything showing acceptability of these from the FCC? If not, we will need to consult with the FCC. Please let us know how you wish to proceed. Please note that the FCC typically takes 3-4 business days to respond to our inquiries.

Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@AmericanTCB.com)

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.