



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

April 15, 2002

RE: FCC ID: GSARFT1A

I have a few comments on this Application.

- 1 The instruction/manual does not contain the warning statement about not modifying the device. Please include the non-modification statement in accordance with CFR47 15.21.
- 2 There is no indication that the device transmits under the 5-sec time constraint of 15.231. The device appears to function automatically during alarm conditions, however, "A transmitter activated automatically shall cease transmission within 5 seconds after activation." Please verify that the device meets this requirement.
- 3 While the manual states that supervisory transmissions occur once every 60 minutes, there is no indication as to how long the transmitter is on during this supervisory condition. This supervisory transmission is limited to no more than one second during on hour. Switch 3 is an on/off toggle switch that selects a 15 min or one hour supervisory mode. The supervisory mode in the US can ONLY BE FOR ONE SECOND IN 60 MINUTES. Please explain how this switch is made inaccessible for use in the US. Or, please explain how this device is limited to one second TOTAL transmit time within the one hour limit for 15.231. For example, a timed 250ms transmission every 15 minutes would meet the one second total transmit time in one hour.
- 4 The instruction/manual states that there is a 'tracking' mode. Please show how this tracking mode does not violate the 5-second transmission limitation or the other data/time limitations of 15.231.

Dennis Ward

<mailto:dward@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.