



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

February 28, 2008

RE: Risco Ltd.

FCC ID: JE4RWRT433

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) The operational description mentions a limited modular approval for the TX. However the application and labeling do not appear to support a modular approval but instead a complete device as a whole. The application does not include a modular approval request letter and is currently being reviewed as a complete approval for the device and not a module. Please review/explain/correct.
- 2) All test photos appear to be from a prescan site. Was final testing done on an appropriate OAT's or FCC listed test site? Please update as necessary.
- 3) Users manual suggests that the unit is programmable from 0 minutes to 255 minutes. Given 15.231(a)(3) limits the supervisory transmissions. Also, this is not meet 15.15 of the rules if the user can adjust outside the range that meets the FCC rules. Also, the operational description stated that a supervisory transmission is sent every 65 minutes. All information must be consistent.
- 4) Page 3 of the manual mentions upload/download of software. How is the device compliant to 15.231 given this fact. Note 15.231(a)(5) and limitation for professional installation that may exist.
- 5) If this device falls under professional installation requirements for 4) above, please note this requires a cover letter requesting and justifying how the applicant ensures professional installation to be provided. The letter should address the following 3 items:
 - a) Marketing
example:
 - The device cannot be sold retail, to the general public or by mail order. It must be sold to dealers or have strict marketing control.
 - b) Requires professional installation;

examples:
 - installation must be controlled.
 - installed by licensed professionals (EUT sold to dealer who hire installers)
 - installation requires special training (special programming, access to keypad, field strength measurements made) What is unique, sophisticated, complex, or specialized about your equipment which **REQUIRES** it to be installed by a professional installer?
 - c) Application
example:
 - The intended use is generally not for the general public. It is generally for industry/commercial use.
- 6) Between the report, theory, questions above, and users manual it is really not clear the various modes of transmit this device is capable of. Kindly provide a list of the various modes and how each complies with the timing requirements of 15.231.
- 7) One of the initialization tests and two tamper tests (i.e. without controller acknowledgement) shows transmission beyond the 5 seconds normally allowed and even the 10 seconds for professional

installation (about 18 sec is shown). While the rules allow security transmitters to transmit for the duration of the alarm, initialization is not considered an alarm condition. Please review.

- 8) The analysis of the pulse period does not appear correct. While one period is measured as 0.625 for the large pulse, smaller pulses appear to occur in a different period. There are many different types of encoding each which can affect the duty cycle differently. Please review carefully. Additionally, note that the FCC is interested in worse case duty factor as well (i.e. all 1's or all 0's if this affects encoding). Given the current margin of 1.4 dB for the fundamental – this needs to be accurately evaluated.



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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.