



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

March 3, 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) Are final test photos from the appropriate test site available regarding previous comment 2?
- 2) Your response to item 6 & 7 suggests that the device is dependent on the system and acknowledgement in order to comply with the 5 second requirement. The certification is for a particular device and not a system and each device must itself be designed to meet FCC rules independent on other devices it communicates with. FCC requires the device itself to limit the number of retrys such that the 5 second requirement is met and not rely on the system as a whole. Note that blanking intervals can be reduced to ensure 7 retrys, but the maximum start to finish time must be ≤ 5 seconds. Note that a lack of response then regenerates the signals – which is then seen as a predetermined interval based on the first event. You also mention that each TX can be considered an event. In my experience the FCC would not consider a “lack of acknowledgement” or “lack of an event” as a trigger for a new event. Please review.
- 3) FYI...If the menu's in the manual are in regards to a different device, then we do not necessarily need to require adjustment for this application. However, please note that having controls – even to the professional installer, which fall outside of technical boundaries specified in the FCC rules is not necessarily considered by some to be “good engineering judgment. See 15.15 of the rules as well. Please note that the manufacturer should consider settings the allowable boundaries in software for the other device such that the installers can not setup the device outside of FCC allowable requirements.

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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.