



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

March 3, 2008

RE: Risco Ltd.

FCC ID: JE4RSAL433

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) Most internal photographs are not clear. Kindly provide clear internal photographs.
- 2) Operational Description mentions no supervisory transmission. Test report does not show any data. However users manual of application JE4RWRT433 mentions a programmable supervisory time and the response in this application mentions a supervisory time in the WisDom panel. Additionally, this suggests a programmable time from 0 to 255 minutes. Even if this is programmable, the time should not be allowed that would cause the unit to be non-compliant with FCC regulations. Please review/explain.
- 3) Operational Description mentions alarm only communicates with sounder, but 3 suggests that there are many devices it may be able to communicate with, especially for supervisory transmissions. Please review.
- 4) Equipment type on the 731 form appears incorrect. Generally this would be DXT.
- 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) Plot 7.2.21 shows transmission beyond the 5 seconds normally allowed and even the 10 seconds for professional installation (about 21 sec is shown). While the rules allow security transmitters to transmit for the duration of the alarm, there is no context related to this transmission. Also, transmissions shown toward the front of the report do not suggest retransmit rates. Please review and explain.
- 7) It appears that this device may attach to a computer. However Certification has not been requested as a PC peripheral device and it does not appear that a DoC has been performed either.

Please review. This device appears to also require a DoC. Because the FCC desires us to verify that a DoC was **properly performed** when this is done (but not actually review the testing and documents associated with this) we have found it best to simply supply an attestation similar to the sample provided if a DoC applies. Kindly provide if applicable.



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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.