



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

March 11, 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) While your response to item 2 makes sense, it does not appear to agree with the following from the RWRT433 manual, or maybe some of the understanding is not clear.

Regarding the [1][1][9] function:

Specifies how often the system generates a supervision request to the sounders.

If any of the sounders does not respond to the supervision request, at least once, during the supervision time of the system receiver (Quick Key [1][3][3]) the system will regard the sounder as Lost

Note that the RWRT433 is a sounder. In the above, it states that the system generates a supervision request to the sounder. It is assumed that it is the panel that is communicating to the sounder in this instance. If not what is communicated to the sounder for supervision?

- 2) The response to item 7 explains that a DoC has been performed. Kindly note that the labeling and manual do not support this fact (i.e. labeling for DoC and 2.1077 information on a single page).
- 3) Your response to item 6 suggests that the device TX 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. For instance, how do we know that the power of the siren hasn't simply run out?

Note that the above is considered in general. However, it may be possible that the 7 pulses may also be classified as “polling transmission to determine system integrity” if they are only occurring because system is trying to check status/integrity of the system in cases when there is a failed response. However information to ensure that this can occur less than 2 seconds per hour should be provided to explain how this is achieved. Note that any settings specified by the installer should not affect the maximum of 2 seconds per hour – for instance they should not be able to adjust settings to levels outside bounds that would cause non-compliance. The device should be designed to not be dependent on installers settings. Please review.

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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.