



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

March 20, 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) Your response 2 below mentions only 3 cases of transmit. It is assumed that this is for initialization, tamper, and alarm. However what about other modes such as setting parameters, acknowledgement, and deactivation? If we are defining the additional 7 pulses as polling pulses, what would occur during acknowledgement or deactivation if the user keeps trying to manually deactivate the siren and it doesn't respond? For instance can the user keep trying to deactivate and therefore exceed the 2 seconds per hour maximum for these additional pulses.
- 2) Much of the previous comments hinge on the idea of the tamper is an alarm condition and can be treated as such. I do not disagree that it is an alarm condition. However as part of this the FCC requires the current condition to be an emergency. In the past the FCC has not allowed transmission for the duration of the alarm unless the particular alarm is an emergency at the time. Please note that I sent a discussion of previous FCC correspondence of a Carbon Monoxide detector. Even though tampering to this can lead to someones death because it didn't properly go off later when carbon monoxide is present, the FCC did not allow tamper or end of life of the sensor to be an alarm condition that can transmit for the duration of the alarm despite the fact that this may lead to accidental deaths and could therefore be considered a security issue at the time. Their opinion was that the emergency is not currently in progress – therefore these transmissions had to meet the 5 second requirement. This is not any different than a tamper condition to the panel during non-armed modes. Note that I have sent this discussion to Marina in a separate email a short time ago.

However, your argument does have merit and I am taking your discussion to the FCC and see if they will not provide a different opinion on this case. I will have to keep you posted for any response that we receive, but kindly understand it may be likely they will not allow tamper (at least during non-armed conditions) to be an emergency situation given previous interpretations such as what I provided.

Because much of the previous response rests with the final interpretation of the FCC on the tamper issue, final review of the previous comments is not yet complete.

**Previous Comments that will need to be reviewed pending a response from the FCC.**

- 1) FYI...Ideally the siren should not accept any programming under [1][1][9] which would allow the 2 seconds per hour limitation to be exceeded. However this is an issue in the other application JE4RWRT433 and will be addressed in that application further.
- 2) There is still confusion over plot 7.2.31. Originally it was cite this was for deactivation – i.e. when the sounder didn't respond which it would be assumed to occur at any time. The last comments then cited this was for initialization only. Given what is occurring, it seems reasonable to assume that 7 additional transmissions may occur if the sounder doesn't response in general at any time (initialization or otherwise). Still, if this is the case, the additional 7 transmissions equate to 210.7 mS per hour. This itself is ok.

The concern is in regards to what limits the design to ensure that these "polling" emissions will never exceed 2 seconds per hour under any circumstances. I.E. User tries to deactivate sounder multiple times or any other perceivable situation to cause multiple de-activations. Ideally there should be a counter/timer internally that limits this to the 2 second per hour limitation.

- 3) Tamper: Will this only trigger a tamper TX if the alarm is set? If so, then given an armed system and it is tampered with and could appear to be considered another alarm condition under 15.231(a)(4) for security purposes. However if tamper transmission may occur at any time, even if the system is un-armed, then typically this is not allowed under 15.231(a)(4) as the condition itself is not life threatening or related to security at the time the transmission takes place. It would be more informative at this time. This condition would require to meet the 5 second requirement during un-armed conditions. However maybe these remaining transmissions may also be considered polling transmissions, then same concern as 2) above exists. There should be a counter for ALL types of polling transmissions to ensure the total 2 second per hour limitation is maintained. Note the only concern here is related to un-armed transmissions where the 7 repetitions occur.



Timothy R. Johnson  
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@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.