



Date: April 17, 2008
American TCB
6731 Whittier Ave
Suite C110
McLean, VA 22101
Attn: Mr. T. Johnson, Examining Engineer

RE: your e-mail dated April 14, 2008; Risco Ltd.
FCC ID:JE4RWSAL433, ATCB005951

5th Reply to ATCB remarks for WisDom panel

The following comment was made by FCC regarding the issue of whether a tamper shall be considered as an alarm:

Part 15.231 (4) only relates to specific subcategory of alarm control signals which are transmitted during emergencies involving safety of life.

In the unarmed state "tamper alarm" is not an immediate life threatening situation and operation under 15.231 (3) conditions would not compromise the system integrity.

In the armed state (If we assume that the alarm siren is wired to the alarm panel and when sounding there is a life threatening situation) then further detail is needed explain what elements are transmitting and receiving the tamper conditions and what are the conditions and states that sound life threatening situations.

In, general, there is nothing in the arguments presented that would allow 15.231 (4) operation in unarmed and armed states for "tamper alarm".

Reply:

First, the quote from 15.231(4) is not complete, this clause states:

"Intentional radiators which are employed for radio control purposes during emergencies involving fire, security, and safety of life, when activated to signal an alarm, may operate during the pendency of the alarm condition"

So it doesn't have to be safety of life, it can be also security alarm, which are usually not life safety related.

Second,

See FCC publication no. 151788 dated 05/10/2007 which is defining tampers as alarm, when there is a likelihood of security breach.

That is exactly our case, the discussed unit is not life safety unit, it is an alarm system And tampers are a breach in the security.

Thanks,

A handwritten signature in black ink, appearing to read "Efi Goren".

Efi Goren
Certification Manager
Risco Ltd.