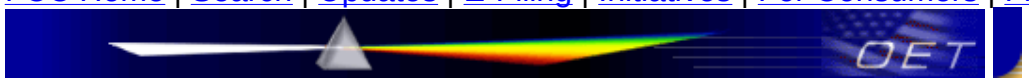
To: (Hermon Labs) Marina Chernyavsky
From: "Timothy R. Johnson" <tjohnson@atcb.com>
Subject: Fwd: Response to Inquiry to FCC (Tracking Number 938039) (TCB)
Cc:

Marina,

Unfortunately the FCC responded like I anticipated (see below). It appears that the functionality proposed will currently be a tough sell with the FCC (However it agrees with my past experience with the FCC). Please let me know how the applicant desires to continue. If they wish to further make their point to the FCC, it would be best to produce a short but concise summary of TX characteristics and their perspective on each "type" of TX so it can be presented without providing various comments/responses. Optionally they may need to discuss directly with the FCC or legal council who can present to the FCC. Otherwise, to continue would likely require software parameters changes. Please let me know...

Thank You,

Tim



Office of Engineering and Technology

Inquiry:

We have a panel for a security system where the manufacturer feels that tamper of the panel may be an alarm condition where the alarm may continue beyond the 5 second period because of 15.231(a)(4).

Some precedence has been set via the attached interpretation for other systems involving safety of life where one may think tamper could be allowed to be a condition that may continue beyond the 5 second period, but the FCC has clearly not allowed in the interpretation attached.

For a current application, the manufacturer makes valid points that have merit in their system for security. Can the tamper be allowed to transmit for the pendency of the alarm for this situation given their explanation from the comments given below?

Comment To Manufacturer:

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 be required 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.

Response Received:

The interpretation of tamper stated above is wrong for two reasons:

a) Related generally to tamper behavior in alarm systems tamper is a 100% alarm condition. It is true that this is a special alarm, but nevertheless it is an alarm. Also a tamper is not limited to armed system, the contrary is the case. When a system is armed, it will be hard for you to approach a unit undetected since every detector will trigger alarm. Tamper will work in arm mode but the main goal of tamper is to make an alarm in unset mode, since it is easy to approach an unset system, to tamper with it so it will not work properly, and then to return when the system is armed and use the advantage created. To summarize, a tamper will cause alarm in both set and unset mode.

b) In specific unit we are discussion, there is another important point. The transmission set to the siren in the case of alarm event is to start the bell and sound the alarm. So the event is the ?Alarm? but the message actually says: ?start making noise?. Now what we call tamper event is only differ in the event, meaning the cause of the message is not spotting someone by a detector, but is due to tampering with the panel or with other components in the system. So the trigger is different (tamper vs. alarm) but message is the same, and therefore the siren gets a ?make noise? message in either case. So tamper shall be assocated with alarm requirements, and therefore 15.231 timing requirements shall not apply to it.

Response:

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 under15.231 (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".

Do not reply to this message. Please select the Reply to an Inquiry Response link from the OET Inquiry System to add any additional information pertaining to this inquiry.

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