

December 19, 2007

RE: Delphi Automotive Systems

FCC ID: L2C0031T

The following is in response to the comments made on the above referenced application.

1) The device contains only 3 buttons and the internal view appear to show that this device will not have more than 3 buttons. Additionally the test report supports this by stating there is only 1 variant. However the schematics clearly show 5 buttons. It appears that the proper schematics have not been provided. Please review.

As noted, the device in question contains only 3 buttons. Internal photographs are provided to show which components are populated, and the Bill of Materials lists only three switches are used. The manufacturer purchases PCB boards in bulk then populates the PCB based on the end product sold to their customer. This end product is tested for regulatory compliance. The manufacturer does not generate unique schematics for their end product, but references the generic schematic provided in relation to the parts list, as supplied.

2) Kindly provide RSS-102, Annex B as necessary for TX devices.

RSS-102 Annex B was provided in the application forms exhibit. While the version provided (RSS-210, 2005) differs slightly from that in RSS-210e (2007) it does contain the same statement of compliance. Future applications will include the slightly modified version in the new RSS-210e.

3) Worse case duty cycle would appear to be a bit lower than cited....It would appear that the following would apply:

$$((49.8 \text{ ms} + 1.5 \text{ ms}) \times (0.320 \text{ ms} / 0.626 \text{ ms})) / 100 \text{ ms} = -11.6 \text{ dB}$$

The two methods of computing the duty cycle are mathematically identical. However, due to the finite discretization used in measuring the transmission period vs. the pulse width, our approach results in a 0.1 dB lower duty cycle than your approach. The test report has been modified to show the more conservative number.