



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

August 24, 2006

RE: Fomotech International

FCC ID: LZ6A4000SERIES

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments. The timing requirements under section 15.231 are quite strict. There are several questions which I need to follow up on before I can qualify this device under this specific Rule.

- 1.) Can any of the push buttons be locked into a continuously-on transmitting mode?
- 2.) Please refer to the Operational Description. "Order 13" seems to indicate that the transmitter board will send signal continuously. This is in violation of 15.231(a).
- 3.) Section 1.1.2 of the same Operational Description appears to indicate the transmitter will transmit continuously every 100msec, or every 250msec if the system is 2nd stage intermittent transmitting. This appears to be in violation of 15.231(a)(3).
- 4.) Section 1.1.3 also appears to be in violation of 15.231(a)(3).

For your convenience, I am also including the text of 15.231(below).

§ 15.231 Periodic operation in the band 40.66–40.70 MHz and above 70 MHz.

(a) The provisions of this section are restricted to periodic operation within the band 40.66–40.70 MHz and above 70 MHz. Except as shown in paragraph (e) of this section, the intentional radiator is restricted to the transmission of a control signal such as those used with alarm systems, door openers, remote switches, etc. Continuous transmissions, voice, video and the radio control of toys are not permitted. Data is permitted to be sent with a control signal. The following conditions shall be met to comply with the provisions for this periodic operation:

- (1) A manually operated transmitter shall employ a switch that will automatically deactivate the transmitter within not more than 5 seconds of being released.
- (2) A transmitter activated automatically shall cease transmission within 5 seconds after activation.
- (3) Periodic transmissions at regular predetermined intervals are not permitted. However, polling or supervision transmissions, including data, to determine system integrity of transmitters used in security or safety applications are allowed if the total duration of transmissions does not exceed more than two seconds per hour for each transmitter. There is no limit on the number of individual transmissions, provided the total transmission time does not exceed two seconds per hour.

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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.