

20 May 2008

RE: Silent Call Communications

FCC ID: PPJSCXMIT01

1) FYI ... The FCC has recently changed their upload site and will be accepting less types of formats. Please ensure ALL exhibits provided to us in the future are PDF.

Noted. All future submittals shall be in pdf format.

2) Please provide appropriate authorization letters and confidentiality letters (please see attached). If confidentiality is not required, please confirm this fact in your response.

Agency Authorization has been supplied in pdf format and uploaded to ATCB site.

3) A block diagram should be provide showing the frequencies of all oscillators in the TX device (CFR 2.1033(a)(5)). Please provide.

Working on this.

4) External and Internal photos are blurry. Kindly provide better photographs. Note one easy way to do this for this type of a device is actually use a scanner instead of a camera. This typically works well since a macro mode is not necessary for a scanner and therefore provides clear photographs.

New Photographs have been uploaded to ATCB website.

5) Kindly provide a separate labeling exhibit. Note formatting of FCC Label should be "FCC ID:". It appears that a space may not be shown between FCC & ID. Note the FCC requires this exhibit to be uploaded separately.

Working on this.

6) Kindly provide a separate operational description exhibit. Note the FCC requires a separate exhibit for this.

Working on this.

7) It is uncertain if the radiated photographs show the correct device. The case of the device appears a different color. Please review/confirm as necessary.

Yes the device is the same. We had multiple samples for testing some of which had black cases some having white. Only difference in device was the color of the housing.

8) It is uncertain that if this is a battery only device (as supported from external and internal photos) how and why the device was tested for conducted emissions. Please explain, review, confirm as necessary.

This device can be either a battery operated device or can connect to the low voltage system of an existing doorbell, smoke alarm, fire alarm, etc. The transmitter of the device is not affected by various low voltage dc connections, whether battery or low voltage supply. Since this device could be connected (indirectly) to the ac mains through another device a low voltage source was used to simulate the effects on AC conducted emissions.

9) Many users manuals where provided (i.e. carbon monoxide sensor, door mat sensor, window sensor, doorbell TX, fire alarm TX, Telephone TX, weather alert TX, etc. Note that none of these appear to cover the device being Certified. Please explain and/or provide the appropriate manual for the device being Certified. Additionally, kindly note that each of the various types of TX's will likely require their own Certification as each type of device typically requires its own FCC ID if the functionality or intended use is different.

This is where I may need some guidance. The transmitter portion of this device is identical in all aspects although the device can be used for different functions. The only difference is the settings of the dip switches which have no affect on the transmitter portion of the device. I originally thought to submit this device as a limited modular approval, however it does not really fit that category. The transmitter is identical in all device and the setting of the dip switches have no affect on the transmitted signal. The customer would like to use one FCC ID as it is the most cost effective. Please advise.

10) 15.15 of the rules does not allow the user to access controls that can cause the device to become non-compliant. User manual statements themselves is not sufficient to be in compliance with 15.15. Kindly explain what dip switches 6-9 do to the device and how it affects any technical characteristics or RF parameters if the user adjusts these switches.

Dip switches have no effect on the transmitter and are used in that portion of the device which is not associated with the transmitter.

The Silent Call system is digitally coded. The address code sent by the transmitter must match the address code that your receiver has been set for. All Silent Call receivers and transmitters leave the factory set for the default address code of 1, 2 and 3 = OFF and 4 and 5 = ON. Unless you have changed the code in your receiver from the factory default setting, you do not need to change the switch settings in your transmitter.

The code switch is accessed by removing the battery cover. The first five positions (left to right) determine the address code that the transmitter sends when it activates. Positions

6-9 determine which alert code light activates on your receiver. Do not change the settings of positions 6-9. If you accidentally disturb them, the correct setting for positions 6-9 is 6 ON, 7 ON, 8 ON, 9 OFF.

- Users manual for the telephone transmitter (thought to be the EUT) does not appear to contain appropriate 15.21, 15.105, etc. statements. Please review, correct as necessary.
- Fundamental emissions limits appear to be slightly off by +0.8 dB. It appears the limits for the fundamental should be pk = 95.8 dBuV/m and avg = 75.8 dBuV/m. Spurious emissions should be pk = 75.8 dBuV/m and avg = 55.8 dBuV/m Please review.
 - You are correct. My calculations were based upon the linear interpolation of the logarithm of the frequency. I use this quite a bit for international and I must have just plugged in the formula. As all the reading were in fact taken in peak mode and showed compliance with the average limits only the average limits with the peak data was provided. Do you require updated data sheets or can you use the existing data to verify compliance with the technical requirements.
- While FCC desires 3 meters on all tests, test photographs appear to support 10 meter testing for some tests. However all data tables show zero for distance correction. Please explain. It is uncertain what tests and why results may have been done at 10 meter.

All tests were done at three meters. I had someone retake the photo for radiated emissions and they set it up for our typical CISPR 22 testing. This is why there are no correction factors. The radiated emissions photograph above 1GHZ shows the correct test distance.

Les Payne DNB Engineering Inc.