



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

March 23, 2004

RE: Electronics Line 3000 Ltd.

FCC ID: RIYEL2620

I have a few comments on the above referenced Application.

EMC Report

- 1) It appears that the devices intent may be to only send data (keys entered) to a receiver. Note that devices intended strictly for data transmission only must be approved under 15.231(e). Note that device does appear to meet the limits of 15.231(e) as given in the test report. Approval to 15.231(a)(1) or 15.231(a)(2) may only be done if the RF packet includes control signals (see next page for a description from recent FCC Report and Order). It is uncertain what is contained in the RF interface transmission for this device. For instance, does it transmit a packet with data only for the entered code, or send data each time a key is pressed or wait and send data with a control signal (arm/disarm), etc. Note that a control code must be sent with every transmission for use under 15.231(a)(1) or 15.231(a)(2). If data only is sent for certain types of transmissions, then compliance must be shown under 15.231(e). Please confirm if the device is being approved under 15.231(e) or alternatively, please explain what types of control signals are being sent to meet the expected requirements of 15.231(a). A theory of operation describing the information contained in each type of packet may be necessary to adequately show compliance to 15.231(a).
- 2) We have not received the plots referenced to show/support compliance to 15.231(a)(1). This information should support the information in #3 below. Please provide.

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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.

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Taken from Commission's Rules  
Amendment of Parts 2 and 15 of the  
Commission's Rules to Deregulate the Equipment

ET Docket NO. 01-278  
RM-9375  
RM-10051  
ET Docket NO. 95-19

12. We find that the restriction on data transmissions by remote control devices in Section 15.231(a) should be removed. As noted by the commenting parties, this change will allow manufacturers to make more flexible, imaginative and useful remote control devices. It is not practical to prohibit all data transmissions as NTIA requested. Virtually all modern remote control devices transmit a string of bits, and bits representing identification codes are indistinguishable from bits representing information. Maintaining the prohibition on data transmission inhibits the development of improved devices that pose no significant risk of harmful interference. We note that the interference potential of a device is a function of the field strength and duration of the transmission, rather than the type of information being sent; and, we are not changing the field strength or transmission timing limits. We decline to remove the prohibition on voice, video and continuous transmissions and on the operation of radio control toys as the Commission proposed in the *Notice*. There are already a number of provisions in Part 15 of the rules that permit voice, video, radio control toys, and continuous transmissions in other frequency bands, so there is no need to establish additional provisions for them under Section 15.231(a).<sup>54</sup> On further review, allowing such operation would in fact significantly and unnecessarily expand the goal of the *Notice*, which was to allow manufacturers to develop devices that transmit identification codes, supplemented with the transmission of some additional data.<sup>55</sup> The net result of the changes we are adopting is that operation under Section 15.231(a) will continue to be limited to devices that transmit a control signal, but such devices will be permitted to transmit data with the control signal. They will have to meet the same field strength, timing and other operational limits that currently exist. We believe that these changes adequately address NTIA's concerns about harmful interference from devices transmitting continuously because the rules will continue to explicitly prohibit continuous transmissions. Furthermore, the transmission timing and other restrictions in Section 15.231(a), which limit operation to devices that transmit a control signal and prohibit voice, video and the radio control of toys, will preclude continuous data transmissions in any case. No changes are being made to Section 15.231(e) because data transmissions are already permitted under this section.