



ADT (Shanghai) Corporation

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Dec. 16, 2005

FCC ID: RNE00991

The following lists are the answers for the comments on Dec, 15, 2005, please kindly have a review on it:

- 1) Please adjust the following exhibits to only show the device covered by this application (remove information regarding the RX) :a) Block Diagram; b) Labeling Exhibit; c) Schematics

Re: See the attachment (RNE00991)BlkDia_1216;
(RNE00991)Label_1216;
(RNE00991)Schem_1216.

- 2) Layout (first page of schematics) shows a 433.92 MHz resonator, while this application appears to be for 315 MHz. Please adjust/correct the application as necessary.

Re: See the attachment (RNE00991)Schem_1216.

- 3) The users manual does not contain proper FCC statements such as the following that are typically required:

Re: See the attachment (RNE00991)UserMan_1216.

- 4) The correction factor applied for average measurements is based upon 300 msec. This is not allowed as the FCC rules cite a maximum worst case of 100 msec. This makes an almost 9.5 dB difference in the allowed duty cycle correction. ($20 \log 0.64 = 3.9$). This will cause reading at the 2nd, 3rd, and also possibly the 5th harmonic to exceed the limit.

Re: See the attachment (RNE00991)TestRpt_1216.

- 5) There are a few readings above 1 GHz which exceed 54 dBuV/m, but average results were not shown. Where peak emissions exceed average limits, average results must be provided as well. Please correct.

Re: See the attachment (RNE00991)TestRpt_1216.

- 6) FYI...The RX appears to be a super-regenerative device and must be approved either by a separate Certification application, or a DoC application. Please note that to qualify to perform DoC applications, the test lab must be accredited by an acceptable agency and meet the requirement of 2.948(e) to perform testing under the DoC procedure and the device has additional labeling and manual requirements for the DoC. Currently labs from China do not appear as an accredited test lab on the FCC site under 2.948(e).

Re: The FCC DOC report is issued by our head office in Taiwan.

See the attachment (RNE00991)TestRpt.Doc_1216.

Thank you very much.