



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

March 17, 2005

RE: FCC ID: S23-GATEWAY1\_ATCB002226

Attention: Mark Briggs

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that while the operational description details the 26ms transmitted packet, it does not show that the transmitter actually shuts off within 5 seconds of activation of transmission. Please provide evidence that the device meets the 5 second transmission restriction requirements of 15.231(a)(1) and/or 15.231(a)(2).
2. Please note that 2.1033 of the rules require that the clock and crystal information be provided for transmitters. Please note that there appears to be a 106.5MHz crystal in the transmitter circuitry for this device. The schematics appear to show that the third harmonic (319.5MHz) of this clock is then 'tuned' in the transmitter circuitry to obtain the transmit frequency. Please explain why this information was not provided in the block diagram for the rf portion of the device. Please provide a block diagram that meets the requirements of 2.1033(b)(5) of the FCC rules.
3. 15.231 states that data can only be sent with a control signal. A control signal indicates that it commands a device to perform a function. The operational description is not clear on the data and addressing features. It states, "The RF transceiver is only used for the purposes of communicating with alarm devices and safety and security sensors. The control information transmitted between the iControl gateway and the devices includes addressing as well as device data." Please confirm that this is to mean that data is only sent in conjunction with a control signal and is never sent alone.
4. Page 31 of the manual states a live video capability. The report indicates that this is done via IP communications, however, neither the manual nor the operational description are clear on this issue. Can the device use rf cameras? If so, this would indicate continuous transmission to the device from a remote camera. Please note that this is not allowed under 15.231. Please verify that this live video capability is not a function of any 15.231 transmitter device.
5. Please note that the manual mentions a keychain remote. This keychain is not an evident part of this application. Does it have its own FCC ID number? Please explain.
6. Page 10 of the report references a version of ANSI C63.4 that has not been acceptable for a number of years. Please note that 15.31(a)(3) institutes the immediate use of the newest 2003 version of ANSI C63.4. Please note that this 2003 version has significant differences and variations from the referenced version in the report. Since 15.37 (the transition section) has no transition time frame for the use of ANSI C63.4 2003, please provide evidence that the report is in accordance with the acceptable ANSI C63.4 2003 test methods and procedures.
7. Please note that the plot of run4 (page 29) and the table of results (page 30) of the test report shows conducted emissions on the "line" lead from 450kHz to 30MHz. Please note that 15.107 and 15.207 conducted limits are from 150kHz to 30MHz. Please explain.
8. FYI – no action needed as the device is still compliant. Please note that the spurious emissions limits for 15.231 devices above 470MHz is an average limit of 61.9dBuV/m ( $20\log[1250\mu\text{V}/\text{m}]$ ) not 55.9dBuV, and the peak would be 81.9dBuV/m not 75.9dBuV/m.

Dennis Ward

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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.