



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

August 27, 2004

RE: FTech Corporation

FCC ID: SBU-TAS

After a review of the submitted information, I have a few comments on the above referenced Application.

**Administrative Issues:**

- 1) Difference in the models given on page 5 mention one model with a difference in software. What is this difference? Does it affect the timing of signals, duration, duty cycle, and/or other TX functions which are important to assuring compliance to 15.231.
- 2) It appears that the duty cycle was calculated from a series of Oscopce plots. However, it appears that the last dying pulse train was not included in the calculation. Since this occurs during a 100 msec period of time, this should also be included. Please adjust the calculation and recalculate average reading using this factor.
- 3) Please explain what shuts off the TX. It appears that the TX may simple continue transmitting until the power generated from each button push by the piezoelectric device is out of energy. If this is the case, has experimentation been done to see if the TX duration varies with each button press? If so, how much does it vary? Does a quick push vary from a slow push? Note the device is already very close to the limits with the duty cycle and correction to the duty cycle given above. Longer duty TX cycles could cause the device to be out of compliance.
- 4) FYI.....From the users manual, it appears that the devices sold for this system may be sold as a stand alone TX, stand alone RX, or combinations of TX and RX's. Please note that the DoC information appears to only be required for the RX portion of the system, which is not the scope of this application (this application is only for the TX portion, the RX are assumed to be approved using the DoC process). Because the DoC is not required for the TX, this portion of the application had not been reviewed. However, please inform the manufacturer that they are responsible for providing the DoC information to the user in each package that only includes a device subject to DoC (i.e. the Receiver portion of this system). A stand alone TX should not include this information.

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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.