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

December 22, 2004

RE: Visonic Ltd.

FCC ID: GSAMCT241MDRL

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

1) When a low battery TX actually occurs, the manual states that the device sends 3 consecutive messages. What is the total TX time of these 3 pulses. Note that 15.231 states < 2 seconds per hour is all that is allowed.
2) Because the device is portable, it must be tested/placed in 3 different axis to determine worse case. The report does not appear to adequately reflect if this occurred.
3) The Maximum TX duty cycle reported on page 6 of 54 does not appear to match the data provided later in the report.
4) Please explain the tile restore TX parameters (i.e. transmit duration, etc.) and how they meet 15.231.
5) FYI…..The labeling shows IC labeling as well. Please note that we can also perform IC Certifications as well. Combining both FCC and IC Certifications at the same time usually produces a cost savings for your clients.

Timothy R. Johnson
Examining Engineer

mailto: tjohnson@AmericanTCB.com

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.