



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

March 18, 2007

RE: Visonic Inc.

FCC ID: GSAMCT442

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

- 1) Please explain the information being presented in Plot 7.1.1 and 7.1.2. One plot appears to transmit in excess of the 5 second requirement and does not appear to be an alarm condition that is life threatening (i.e. not a pending emergency for tamper condition). Tamper appears to take 19 seconds which exceeds the 5 second requirement.
- 2) From the operational description, for each of the following conditions please explain how the device will transmit: CO gas alarm, low battery, tamper, sensor end of life (5 years), sensor trouble, supervision. Note that for alarm condition of CO, this can transmit continuously since it is a danger to human life. Others are considered a single event and should only transmit a single time < 5 seconds when triggered. Information regarding the low battery, sensor end of life or trouble may be re-transmitted as part of the hourly supervisory transmission, but the original transmissions are considered a single event and limited to the one 5 second transmission. Please explain.
- 3) If the device is transmitting continuously due to measurement of CO. If CO is not longer detected, please explain if the alarm condition stops/resets.
- 4) Plot 7.1.4 also appears to exceed the transmit time of 5 seconds. The explanation does not appear to make sense or show compliance (i.e. turn on appears > 5 Seconds) Please explain in further detail.
- 5) If turn on is > 5 seconds as shown in plot 7.1.4, this appears to be out of compliance as it is expected that the end user may be expected to change the batteries if necessary and then initiate a turn on procedure. This would no longer be under control of a professional installer at this time.
- 6) If professional installer is being used for any transmissions above, then please note the following interpretation.

Inquiry:

Regarding 15.231 (a)(5) which states: provided such transmissions are under the control of a professional installer and do not exceed ten seconds after a manually operated switch is released or a transmitter is activated automatically. Such set-up information may include data. Is there any specific guidance that should be submitted by the applicant to support this? Should the device be designed so that only the professional installer can access the functions related to this? Is it sufficient to state in the manual that certain setup/test functions only be used by the installer? Please provide some guidance on what the applicant should provide in their application.

Response:

The applicant should confirm the following when justifying Professional installation:

Professional installation

To qualify for professional installation, you must explain why the hardware cannot simply be purchased and installed by the average (technically inclined) person

1) Marketing

* The device cannot be sold retail, to the general public or by mail order. It must be sold to dealers.

2) Requires professional installation;

- installation must be controlled.

- installed by licensed professionals (EUT sold to dealer who hire installers)

- installation requires special training (special programming, access to keypad, field strength measurements made) What is unique, sophisticated, complex, or specialized about your equipment which REQUIRES it to be installed by a professional installer?

3) Application

-The intended use is generally not for the general public. It is generally for industry/commercial use.

A handwritten signature in black ink, appearing to read 'Timothy R. Johnson', is positioned above the printed name.

Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](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.