

November 30, 2005
RE: Delphi Automotive Systems
FCC ID: L2C0028TR

The following is in response to comments made on the above referenced Application.

1) This device is not manually activated but is considered to be automatically activated (activated by external event). To meet the timing requirements, even if the LF TX is continuously pressed beyond 5 seconds, this device should still shut off within 5 seconds. Timing shown on page 7 shows this device continues to transmit even after 5 seconds. Please review and explain how this device is compliant to this requirement.

The timing plot shown on page 7 was actuated with a modified LF initiator, set to repetitively stimulate the transmitter for testing purposes. In actual production the LF initiator only fires a single LF pulse when the user gets onto the motorcycle, and cannot be "continuously pressed" by the consumer. In addition, the LF pulse must be properly encoded, thus preventing the transmitter from being activated by any other external LF source. Since it is not possible to continuously stimulate the FOB, we feel it meets the requirements above.

2) From the new issue of RSS-102, an attestation should be provided for all devices. Please see updated form attached.

The revised Filling Forms exhibit includes the desired attestation.