

From: Amos Daskal [amosd@access-1.com]
Sent: יום 14 ינואר 1999 20:27
To: jdichoso@fcc.gov
Cc: Gonen Hermon; mail@hermonlabs.com
Subject: RE: FCC ID OC8SA108

Dear Mr. Joe,

Re: FCC ID OC8SA108.

Regards First Access device FCC regulation limitations, we had long discussions with Dr' Edward who is the CEO of Hermon labs and we would like to confirm with you some questions. We took into consideration the adjustment of First Access devices in order to meet those regulations.

- 1) What is the definition of a Periodic operation?, is it only when the customer is involved within such an operation, or it may be a 'security' interval of the PC?.
- 2) If we not a period device, is data transmission allowed in the 433.92Mhz band?
- 3) If we meet 15.209 requirements, is every thing is allowed under those limits?
- 4) Regards the data transmission, we have only a recognition code, several bits. It is built from several bytes which are constant and doesn't change and the others are changing by the microcontroller encrypted – that in order to disable unwanted access by recording our Card. First Access product by definition is a card recognition solution. We understand that recognition is allowed (FCC 15.231).
- 5) If we be in the 902-928MHz band (FCC 15.249) what is allowed there? , Data transmission, Periodic transmission?.

We appreciate your effort for such a response.

Thanks and regards, Amos

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-----Original Message-----

From: OET [<mailto:oetech@fccsun07w.fcc.gov>]
Sent: Monday, April 12, 1999 9:31 PM
To: amosd@access-1.com
Subject: tx

To: Amos Daskal, null
From: Joe Dichoso
jdichoso@fcc.gov
FCC Application Processing Branch

Re: FCC ID OC8SA108
Applicant: First Access Limited
Correspondence Reference Number: 7170
731 Confirmation Number: EA93291
Date of Original E-Mail: 04/12/1999

Dear Mr. Daskal,

With regard to periodic transmissions, random transmissions every 1.5 to 2 seconds is still considered periodic transmission. What is this transmission for?

With regard to data transmission, At first you state that there is no data transmission, then you state that there is data transmission every few hours. Data transmission is not allowed under 15.231(a). The device reads cards and verifies whether the card is valid or not by the information on the card. This information is considered "data". Also, if the trigger is controlled by the User/PC, how is this limited every few hours. Can't the user trigger the authentication process anytime?

Unless the device is modified to meet the rules, it will have to be dismissed.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1108.

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Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.