



15 April 1999

FCC ID: OC8SA108

To: Mr. Joe Dichoso.
From: Amos Daskal.
CC: Dr. Edward Usoskin, Moshe Elgressy.

RE: 731 Confirmation Number: EA93291
Correspondence Reference Number: 7170

Dear Mr. Dichoso,

Thank you very much for your prompt response and all your assistance. I hope that are not proving a nuisance, and that you will appreciate the situation of time and resources which have been spent thus far in the development. As such, it still appears to us that we have a misunderstanding regarding the definition of a "periodic transmission" regarding our present transmission strategy.

Your response was as follows:

PERIODIC OPERATION IS AN OPERATION THAT OCCURS AT REGULAR INTERVALS.

Point #1

Our card broadcasts a "recognition code" the length of transmission being at most 2.5 ms. This transmission is broadcast at random intervals. The interval length changes between 1.5 - 2 seconds. According to your response this strategy still falls under the definition of "periodic operation".

According to our understanding of the FCC regulations, this strategy should not be considered periodic operation because the intervals between broadcasts are not regular.

Can you please confirm this point?

Point #2

If the above strategy still falls under the definition of periodic operation, can you please comment on the following strategy:

If we transmit the same recognition code at random intervals of between 1-3 seconds. Is this also considered periodic operation?

If so, what change would be necessary so as not to be considered periodic?

We are concerned that the problem of definition is due to our explanation of the process in English. Is it possible that we could call you in order to clarify this issue?

Thank you again for your kind attention and assistance.

Best Regards, Amos