FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

SEP 1 1994

IN REPLY REFER TO:
31030/EQU/4-2-4
1300B4

Mr. Valdis V. Liepa
University of Michigan
Radiation Laboratory
NASA/Center for Space Terahertz Technology
3228 EECS Building
Ann Arbor, MI 48109-2122

Dear Mr. Liepa:

This is in reply to your facsimile transmission of August 2, 1994, regarding the labelling of a low power communication device that will be marketed within the U.S. and Canada. You request approval to combine the labels for both countries, permitting a single label to be employed. As indicated, this combined label would read as follows:

> "This device complies with Part 15 of the FCC Rules and with RSS-210 of the Industry Canada. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation."

According to Section 15.19(a) of our rules, a low power communications device operating under Part 15 must be labelled with the specific statement contained in paragraph (a)(3). The only difference between the statement required under our rules and your proposed statement is the addition in the first sentence of the phrase "... and with RSS-210 of the Industry Canada."

I note that Kwai Lum of Industry Canada, in a facsimile to you on August 3, 1994, has already given permission to use this combined label. I also agree that the use of this combined label, as shown above, is acceptable under our regulations. This label conveys the desired information and is essentially identical to our requirement. As expressed by Mr. Lum, text denoting compliance with the standards for both countries was not stated in our rules as "it would be too presumptuous [to assume] that all products are for both markets."

I trust that the above responds to your inquiry. Additional questions should be directed to John Reed, 1300B4, at the address on the letterhead or at (202) 653-7313.

Sincerely,

for Richard B. Engelman
Chief, Technical Standards Branch
Office of Engineering and Technology

Government of Canada
Industry Canada

Gouvernement du Canada
Industrie Canada

FACSIMILE SHEET **FORMULE D'ENVOI PAR TELECOPIEUR**

TO/A: Name/Nom.....: Mr Valdis V. Liepa
Office/Bureau.: Radiation Lab, University of Michigan,USA
Tel. No./No. de tél.: Fax: 313-747-2106

FROM/DE: Name/Nom.....: Kwai Lum
Manager, Radio Equipment Standards,
300 Slater Street, 13th Floor,
Ottawa, Canada, K1A 0C8
Phone: 613-990-4699; Fax: 613-952-5108

Total pages : 1
Pages totales:

Date & time sent: August 3, 94.
Date & heure envoyé:

Our Ref : DGEP-5630-1 (RSS-210 Labelling)

This is to respond to your fax of August 1, 94 requesting that we permit a combined statement for FCC and Industry Canada on the equipment labels.

We wish to assure you that your suggested combined label that you submitted in your fax is acceptable to Canada since our standard (section 5.8 of RSS-210) allows (to quote) ".....equivalent statement....".

We have made our labelling statement as close as we can to Part 15.19(3); the differences are : we left out the word "harmful" because of difficulties in defining what is harmful. We added the phrase "of the device" to remove any possible misunderstanding.

To re-capitulate, although your proposed statement uses FCC text except for the mention of "RSS-210 of Industry Canada", we consider it to be equivalent. Our preferred text is per RSS-210; the next best is to add the word "harmful" to meet FCC requirements.

Since FCC and Industry Canada are from different countries, we do not consider it necessary to state in our separate standards a combined text. In any case it would be too presumptuous that all products are for both markets.

Our equipment certification staff will be informed of the above. We will also copy this to Mr Reed of the FCC since you said that you sent a similar fax to him.

Regards,

Kwai Lum

cc Mr John Reed (FCC OET fax 202-653-8773).
cc R. Corey (Equipment Certification).

Re: Certification for Digi-code Transmitter
Models: CR5030, CR5032
FCC ID: OWMSC-DIGICODE
CANADA: to be provided by IC

POWER OF ATTORNEY

A letter granting Valdis V. Liepa the Power of Attorney is on file and can be provided when so requested.

UNIVERSITY OF MICHIGAN
COLLEGE OF ENGINEERING
THE RADIATION LABORATORY
DEPARTMENT OF ELECTRICAL ENGINEERING
AND COMPUTER SCIENCE

3228 EECS BUILDING
1301 BEAL AVENUE
ANN ARBOR, MICHIGAN 48109-2122
734 764-0500 FAX 734 647-2106
http://www.eecs.umich.edu/RADLAB/

Re: Certification for Digi-code Transmitter
Models: CR5030, CR5032
FCC ID: OWMSC-DIGICODE
CANADA: to be provided by IC

REQUEST FOR CONFIDENTIALITY

Pursuant to 47 CRF 0.459, Digi-code requests that a part of the subject application be held confidential. This comprises Exhibits

(5) Schematics
and (10) Parts List (Part of Exhibit only)

Digi-Code has spent substantial effort in developing this product and it is one of the first of its kind in industry. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will definitely result in a financial hardship.

If there are any questions regarding this request, please contact me at the above address or call 647-647-1792, (lab) 734-483-4211, fax 647-647-2106 or e-mail liepa@umich.edu.

Sincerely,

Valdis V. Liepa
Research Scientist
University of Michigan

Re: Certification for Digi-code Transmitter
Models: CR5030, CR5032
FCC ID: OWMSC-DIGICODE
CANADA: to be provided by IC

GENERAL PRODUCT INFORMATION

The device, for which certification is pursued, has been designed by:

Digi-Code
307 Robins Drive
Troy, MI 48083

Richard Caceres
Tel: 248-589-3645, x237
Fax: 248-588-6801
PO: D-1022

It will be manufactured by:

KDS Controls
307 Robbins Drive
Troy, MI 48083

It will be marketed and serviced by:

Digi-Code Inc.,
307 Robbins Dr.,
Troy, MI 48083

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June 12, 2000

Re: Certification for Digi-code Transmitter
Models: CR5030, CR5032
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STATEMENT OF MODIFICATIONS

There were no modifications made to the DUT by this test laboratory. (Also see Section 3.1 of the attached Test Report).

Valdis V. Liepa
Research Scientist