hi Tim,

Below are the responses for the comment :

1) Previous transmitters reviewed would meet the FCC requirements regardless of the encoding scheme use. However for this transmitter, worse case encoding must be understood to ensure this device always meets the FCC rules. Please note that for duty cycle corrections, the FCC requires worse case. In theory, this device sends 16 pulses per period. It appears that the pulses are width encoded. Worse case encoding could be considered to be 16 pulses at 1.03 ms per 22.3 ms. This would yield only a correction factor of 2.6 dB and would cause the device to be in excess of the average limits. It is uncertain what the theoretical worse case data encoding will actually be (considered more than one button can be pressed at a time. Please ensure the worse case duty cycle has been evaluated and provide information as necessary.

Worst case has been verified, different combination of buttons can only yield different positioning of the pulse, that is the period of the transmitter is remain unchanged,

but the position of the longer pulse (1.03ms) and shorter pulse (0.33ms) is changed.
That makes the average factor remain unchange (-7.4dB) for all combinations, since the duty cycle still include 6 long pulses and 10 short pulses.

Details can refer to the attachment for two examples of different buttons combination. (I also attached 49MHz duty cycle for your reference)

2) FYI….The preferred form for the FCC label uses the term “FCC ID:” (with colon) not simply “FCC ID”. It is recommended that this is changed.

A revised FCC Label is attached. (Both 27MHz and 49MHz devices are revised)

Best Regards,

Tommy