



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

October 7, 2002

RE: FCC ID: Qk7fh-me
Attention:

I have a few comments on this Application.

- 1 The device uses a "Direct Mode". The manual describes this as the appliance being on as long as the switch is pressed. The test report also states that the device is battery operated and does not connect to the AC mains. 15.231 devices cannot operate in a continuous transmission mode. 15.231 devices are limited to non-periodic, non-continuous control code transmissions only. Thus, it would not appear likely that an appliance could be directly connected to this device. Consequently, please explain how this direct mode works and how it prevents rf transmission while the switch is depressed while operating the appliance?
- 2 Please explain how this device meets the requirements of 15.231 to automatically limit operation so that the duration of each transmission shall not be greater than one second and the silent period between transmissions shall be at least 30 times the duration of the transmission but in no case less than 10 seconds.
- 3 The device is capable of operating up to 256 devices. This means that over 256 control codes are possible with this device. The test report is vague on the preliminary testing of random or selected control codes to establish which switch settings provided the worse case modulation. Please explain what measures were made to establish which control code settings provided the worse case.

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.