October 15, 2001

Detection Systems
130 Perinton Parkway
Fairport, NY 14450
c/o
Retlif Testing Laboratories

Attention: Rich Reitz

We have reviewed the Detection Systems Security Escort, Watch/Pendent Panic Transmitter FCC ID number ESV-0117-05, which was presented for certification.

Upon review of the Detection Systems Security Escort, Watch/Pendent Panic Transmitter FCC ID number ESV-0117-05, it was determined that a clarification must be made before certification can continue.

1. Report of Measurements Section
    a. For 15.231(a)(1), states transmitter ceases within 5 sec. Of deactivation. Explain. What happens during alarm? Does the "auto-tracking" cease when the alarm is deactivated?
    b. Explain how the SE88-10S-304 meets the periodic transmission limitations described in 15.231(e). The silent period between transmissions must be at least 30 times the duration of the transmissions. You show the supervisory transmission as 4 packets which could have a max. duration of 4(20ms)+3(275ms) = 905ms. X30=27.15sec. Minimum silent period.
    c. For 15.231(a)(4), explain how the "auto-tracking" mode meet the intend of "pendency of alarm".
    d. For 15.231(b), since this device uses periodic transmissions the limit of 15.231(e) will apply? Please make corrections.
    e. Under "Determination of Limits", the reference limits should be changed to the ones in 15.231(e). Also, the limit of 1050 uV/m (too low) for the fundamental is not correct. In turn, the limits shown on the data pages are not correct. Please make corrections.

The status of your application for certification authorization has been placed on hold for a period of 30 days. During this time Elite will be happy to answer any questions or assist in any way possible for a successful grant of certification authorization. At the conclusion of the allotted 30-day period, Elite reserves the right to dismiss your application for certification authorization if no reply to this inquiry is received.

Sincerely,

Richard King
Certification Department Coordinator
ELITE ELECTRONIC ENGINEERING

Response to above questions from Elite

1. FCC 15.231(a)(1) states that the transmitter shall cease transmission within 5 seconds of deactivation. Please explain what happens during an alarm. Does the "auto-tracking" cease when the alarm is deactivated?

A: An alarm and therefore, auto-tracking begin when the large button is pressed and stopped when the small button is depressed. If the small button is not pressed to deactivate the alarm within 15 minutes, it will shut off the auto-tracking function after 15 minutes. The auto-tracking function does cease when the alarm is deactivated.

2. Explain how the SE88 meets the periodic transmission limitations of FCC 15.231(e) which states the silent period must be at least 30 times the duration of transmissions. You show the supervisory transmission as 4 packets which could have a maximum duration of 4(20ms) + 3(275 ms)= 905 ms *30=27.15 seconds for the silent period.

A: This statement is incorrect. A supervisory signal is only 2 packets. Therefore, the maximum duration is: 2(20mS) + 1(275mS)=315mS>> 315mS* 30=9.45 S for the minimum silent period. 15.231(e) restricts the minimum silent period to 10 S. The SE88-10S-304 transmits a supervisory signal every 12 S, the SE88-30S-304 every 30 S and the SE88-60M-304 every 60 minutes.

3. For 15.231(a)(4), explain how the "auto-tracking" mode meet the intent of "pendency of alarm"

A: In our discussions back and forth, we requested a definition of "pendency of alarm", which is not defined anywhere in the FCC rules… Detection systems provided the following description of how the system is used in order to justify the 15 minute "auto-tracking" time as being a reasonable time for an "alarm" condition to exist.

The SE88 is a panic-type transmitter that allows the user to alert security or medical personnel in a distress event. Once activated the device continues the transmission of an alarm signal every 7 seconds for a 15 minute period, unless it is deactivated by the user or medical/security personnel. This 15 minute period allows security/medical personnel to triangulate the physical location of the user, even if moving. This is usually enough time for emergency personnel to dispatch the required assisance to the user's location. When emergency personnel arrive at the users location, they deactivate the alarm signal if the 15 minute auto-tracking is still operating.

For the last two items (d & e)please refer to the attached file named newdata&report.zip for corrected limit information.