

January 8, 2001

Federal Communications Commission
Authorization and Evaluation Division
Laboratory Division
7435 Oakland Mills Road
Columbia, MD 21046

Re: Correspondence Reference Number 17571
Compliance with Rule 2.1

FCC ID: BVCDMS915
Form 731 Confirmation No.: EA99160

Dear Mr. Chang:

I would like to open the response with a statement of the purpose of this approval. We are not introducing a new product into the market; rather, we are delaying the obsolescence of a mature product. We have replaced a circuit in a previously approved product because the original components became unavailable.

You have asked the same question that was raised 10 years ago by Mr. Ed Gibbons. Please refer to item 3 of the exhibit, "Ed Gibbons Fax". The issue was discussed with Mr. Dave Means in July of 1991. The transmitter produces a frequency hopping 900 MHz signal that mixes with a 111.5 kHz signal in a tag consisting of an antenna and a diode placed on merchandise to be protected. The system receiver receives the 900 MHz mixed signal and demodulates the modulation of the 111.5 kHz. Mr. Means assessment was that as a system, "the entire system meets the requirements of 15.247... As the receiver receives a spread spectrum signal and there is no issue of interference, the FCC will accept this system as a spread spectrum system governed by 15.247". Please refer to exhibit "Dave Means Response".

Hopefully this sheds enough light on the issues to be able to issue a grant of authorization for this product.

Should any additional information be required, feel free to contact me by email at umbdenstock@sensormatic.com, or by phone or fax per the numbers below.

Sincerely,

Donald J. Umbdenstock
Senior Principal Engineer, Compliance Engineering