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To: kyle@celectronics.com  
Date: Tue, 26 Dec 2006 10:00:24 -0500 (EST)  
Subject: Response to Inquiry to FCC (Tracking Number 379492)

## **Inquiry:**

Hello,

I have a question regarding the duty cycle plots and calculation for a pulsed modulation transmitter that is going to be certified.

The device that is going to be certified will be using an encoder that uses an algorithm to change the code of each packet during transmission, not just after each button press. This is done for security purposes to prevent code capture, similar to other code hopping encoders already on the market.

Because of this, it makes it essentially impossible to acquire the code and provide the duty cycle plots that are typically required for certification of a device like this since the code changes with every transmitted packet.

The manufacturer of the encoder states that the duty cycle may change slightly, but will never be higher than a certain percentage. In such a case, would it be permitted for the Grantee to provide a written explanation, from the manufacturer of the encoder, of what the highest possible duty cycle is instead of showing the plots and then use this explanation when we calculate the average field strength and submit for certification?

Thank you for your help.

**Response:**

You should obtain an explanation and measurement data from the manufacturer showing the highest possible duty cycle and submit with your application for Certification.

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.