

FISH & RICHARDSON P.C.

1425 K STREET, N.W.
11TH FLOOR
WASHINGTON, DC 20005

Frederick P. Fish
1855-1930

May 12, 2003

W.K. Richardson
1859-1951

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Telephone
202 783-5070

Facsimile
202 783-2331

Web Site
www.fr.com

Robert J. Ungar
(202) 626-6381

Email
ungar@fr.com

Re: *Ex Parte* Filing of Interlogix, Inc. in ET Docket No. 01-278

Dear Ms. Dortch:



BOSTON
DALLAS

DELAWARE
NEW YORK

SAN DIEGO

SILICON VALLEY

TWIN CITIES

WASHINGTON, DC

On Tuesday, May 6, 2003 and Wednesday, May 6, 2003 Terry G. Mahn and Robert J. Ungar, on behalf of Interlogix, Inc. met with Julius Knapp and Bruce Franca, respectively, and discussed comments filed by Interlogix in the above-referenced Docket.

It was reiterated that Interlogix's position is that the Commission should amend Section 15.231(a)(1) and (2) to take into consideration the transmissions of pulsed devices which, because of their duty cycles may actually be permitted less "on time" than the continuous transmissions that were the original focus of the rule. Interlogix argued that the rule should require deactivation of transmissions after 5 seconds of actual on time.

Similarly Interlogix urged the Commission to amend Section 15.231(a)(3) to permit a total of one second transmission time per hour to account for the ability of devices to transmit more information in shorter intervals. Interlogix also requested 15.231(a)(3) be amended further to permit a duty cycle of two seconds an hour instead of one second.

If there are any questions, please contact the undersigned.

Respectfully yours,

Robert J. Ungar
Terry G. Mahn