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March 12, 2007

FILED/ACCEPTED

MAR 12 2007

Federal Communications Commission
Office of the Secretary

BY HAND DELIVERY

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ET Docket No. 06-195, UltraVision Security Systems, Inc., Request for Interpretation and Waiver of Section 15.511 of the Commission's Rules

Dear Ms. Dortch:

On March 8, 2007, I filed a "Reply to Comments of MSTV" in the above-referenced docket. That filing included two attestations with typed signatures.

Enclosed are the identical attestations with ink signatures. Kindly substitute these for the respective pages filed on March 8.

Please do not hesitate to call with any questions.

Respectfully submitted,



Mitchell Lazarus
Counsel for UltraVision Security Systems, Inc.

ML:Deb

Enclosures

cc: Service list

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TECHNICAL CERTIFICATION

I am a technically qualified person who reviewed the foregoing Reply to Comments of MSTV.

I certify that the technical statements therein are correct to the best of my knowledge.

A handwritten signature in cursive script, reading "Dennis J. Johnson". The signature is written in black ink and is positioned above the printed name and title.

Dennis J. Johnson

President

UltraVision Security Systems, Inc.

3/8/07

DECLARATION OF DENNIS J. JOHNSON

1. My name is Dennis J. Johnson. I am President of UltraVision Security Systems, Inc., 88 Stiles Road, Suite 103, Salem NH 03079.
2. I am a trained and qualified electrical engineer and have practiced that profession for 30 years.
3. I was present in the offices of MSTV on November 9, 2006, along with my counsel, Mitchell Lazarus, and Messrs. Victor Tawil, Bruce Franca, and David Donovan of MSTV. I participated in the informal demonstration described in the "Declaration of Bruce Franca" appended to the Comments of the Association for Maximum Service Television, Inc. dated February 20, 2007, filed in ET Docket No. 06-195.
4. Mr. Franca's Declaration alleges there was "significant interference" to both analog and digital TV over a distance of "about 25 feet." Declaration of Bruce Franca at 1. Mr. Franca does not make any distinction between analog and digital reception in this regard.
5. I saw detectable interference to digital reception only out to an estimated distance of 15 feet. No interference was visible beyond about 15 feet for digital and about 25 feet for analog.
6. Mr. Franca's Declaration further states that he and his colleagues explained that "the received digital TV signals were generally strong." Declaration of Bruce Franca at 2.
7. No one measured the received TV signal strength. No one evaluated whether the location of the MSTV offices relative to the various TV transmitters, or the low height of the office location relative to ground level, or construction of the building, or intervening buildings, terrain, etc. may have affected the received TV signal strength.
8. In my own opinion, considering the very limited nature of the November 9, 2006, demonstration, it is infeasible to extrapolate the results beyond the conditions of the demonstration itself. In particular, it would be unjustified to use the results for making predictions about whether TV interference will or will not occur under other circumstances.


Dennis J. Johnson
3/8/07

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