



August 12, 2008

Mr. Raymond A Laforge
Auditing & Compliance Branch Chief
Federal Communications Commission
Office of Engineering and Technology
445 12TH ST SW
Washington DC 20554

Re: Use and Sale of the Multanova DRS-3 Non-Type Accepted Radiolocation Transmitter Device

Dear Mr. Laforge:

Redflex Traffic Systems ("Redflex") a subsidiary of an Australian public company, Redflex Holdings Limited, appears to have been using another radar speed meter without a Grant of Authorization for Type Approval by the FCC.

Upon information and belief, Redflex is marketing and operating radar antenna systems on behalf of US law enforcement agencies relating to photo traffic speed enforcement programs. These radar units are manufactured and supplied to Redflex by a German company called Robot Visual Systems GmbH. It is believed that the radar units known as the DRS-3 operate at a frequency range of 34200.0 - 34400.0 MHZ. Comprehensive searches of the FCC website and database were unable to identify evidence that the DRS-3 radar has been Type Accepted by the FCC.

Redflex is marketing and operating the DRS-3 radar in the United States, without FCC certification and without any labels or markings showing an FCC ID. Exhibit 1 presents pictures captured on August 11, 2008 which shows two DRS-3 radar antennas mounted on a Redflex photo enforcement vehicle operating in the City of Tempe, AZ. Note that the close up pictures of the radar ID label shows the German PTT Certification, but there is no FCC ID displayed. Our understanding is that none of the DRS-3 radars operated by Redflex display an FCC ID. Redflex has been operating the DRS-3 radars for many years in AZ, CO, OR, CA, NM, LA, OH, WA and other states. The DSR-3 radar unit is also frequently marketed and displayed at trade shows including the International Association of Chiefs of Police.

These radar units transmit and receive radio waves in a bandwidth that is specifically regulated by the Federal Communications Commission ("FCC"). See FCC Rule 90, Subpart F and I in Exhibit 2. Such a "Radiolocation Transmitter Device," (also known as a traffic speed radar system) cannot be marketed for sale, sold or used in the United States without being Type Accepted by the FCC. Other manufacturers with similar devices have applied for and obtained Grants of Authorization and Type Acceptance for such devices and it is our assumption that the DRS-3 must also be Type Accepted prior to being marketed for sale or used by Redflex or any other entity. It is our understanding that Type Acceptance for the DRS-3 radar must be obtained and approved under Part 90. A certified Redflex Radar Speed Camera Deployment Form is attached as Exhibit 4, which includes a description of the Multanova 9F, which uses the DRS-3 as its radar detector. Also attached is a facsimile transmitted from Multanova to Redflex on November 1, 1996, which presents DRS-3 speed accuracy specifications and Swiss Homologation (Swiss Type Acceptance) references for the radar. Absent at that time was any reference to FCC Type Acceptance or Grants of Authorization.



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We understand that anyone who imports a device that is not Type Accepted and certified by the FCC is required to apply for a Temporary Grant of Authorization for a limited quantity of devices, for limited purposes such as testing. This requires a Declaration and submission of FCC Form 740 (attached as Exhibit 3). According to Form 740, making a false declaration (or failure to file a FCC Form 740) subjects the Importer to fines of up to \$250,000 and/or up to 5 years imprisonment.

We request that the FCC search its records to determine if Redflex filed a Form 740 Declaration at any time in connection with the importation of the DRS-3 devices and whether a Temporary Grant was given by the FCC.

This letter is a Formal Complaint and request the FCC intercede and require Redflex to stop marketing, selling and using the DRS-3 radar antenna until such time as Type Acceptance is granted by the FCC. We also request that the FCC enforce any penalties that may be due as a result of potentially illegal actions and use.

The contact details for Redflex Traffic Systems are as follows:

Statutory Agent
Redflex Traffic Systems
c/o National Registered Agents, Inc.
Statutory Agent
638 N. 5th Avenue
Phoenix, AZ 85003

Corporate Offices
Redflex Traffic Systems
Ms. Karen Finley
President / CEO
15020 North 74th Street
Scottsdale, Arizona 85260

Thank you for your consideration on this matter. Please feel free to contact me directly at any time via telephone - (480) 596-4608, or email - philip.underhill@atsol.com

Sincerely,

American Traffic Solutions, Inc.

A handwritten signature in black ink, appearing to read 'P. Underhill', is written over a faint, larger version of the same signature.

Philip Underhill
Vice President Project Delivery

cc: Jim Szeliga

fcc complaint - redflex use of drs-3 radar 080908