

Monarch

Monarch Marking Systems, Inc.

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November 11, 1998

BY COURIER

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals, TW-A325
445 12th Street, S.W.
Washington, DC 20554

Re: RM-9375

Dear Ms. Salas:

Monarch Marking Systems is a global company and sells its products into world markets. Monarch products are used for identification purposes in apparel manufacturing, consumer goods manufacturing, the retail supply chain, and retail establishments. Monarch design goals are "Products that can be used effectively within both domestic and international markets." Since identification means would be installed in one country and then used within other countries, there is need for product specifications to be consistent over the global marketplace.

Identification products in the 13.56 frequency range would be incorporated in products produced in one country and shipped into another country. Users of these identification products would expect operation to be consistent independent of the country of initiation. Under current regulations, effective process operations in Europe could not be replicated in the US because of the reduction in range.

Spectrum allocation and power level considerations must consider alternate uses and operations. Experience in Europe has shown that the spectrum and power level assignments operative in Europe do not pose unacceptable interference levels for alternate uses and operations in the 13.56 frequency band.

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For these reasons and those provided by other users, Monarch would ask that the FCC respond favorably to the request to amend Section 15.225 of the FCC rules to facilitate the operation of short-range devices in the 13.56 +/- 0.007 MHz band.

Very truly yours,

A handwritten signature in cursive script that reads "Joseph J. Grass".

Joseph J. Grass

Intellectual Property Counsel

cc: Mr. Joseph A. Naujokas and Dr. Joseph VJ Ravenis II