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November 11, 1998

Ms. Magalie Roman Salas

Office of the Secretary

Federal Communications Commission

The Portals, TW-A325

445 12<sup>th</sup> Street, S.W.

Washington, DC 20554

Re: RM-9375

Dear Ms. Salas:

Federal Express Corporation, Inc. (Federal Express, FedEx) supports the proposal of the National Council for Information Technology Standardization Technical Committee 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.

FedEx operates in 221 countries and supports any effort to standardize the regulations of the United States and other countries. As a worldwide airline FedEx is required to comply with the regulations of many countries. The compliance by and education of FedEx employees requires constant diligence and significant costs.

The global requirements for electronic devices much too often require a differing product be used to perform the same function in different countries. This adds often-unnecessary complexity to many routine business activities. The rapid proliferation of wireless devices in countries with differing regulations adds many complexities to what are relatively simple activities in the U.S. Federal Express feels that would be in the best

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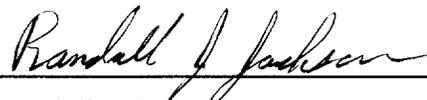
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interests of the public if the U.S. regulations of the ISM bands were harmonized with those of other countries when ever possible.

Radio Frequency Identification products (RFID) and smart cards which operate in the 13.56 ISM band may be used by airlines to improve passenger safety and convenience. Many other potential applications of this developing technology are yet to be found and may be further delayed or never implemented due to the more stringent U.S. regulations. The continued expansion of U.S. business into the global market place will be facilitated by internationally compatible standards.

Federal Express urges the Commission to issue a Notice of Proposed Rulemaking to amend Section 15.225 of the Rules as requested by Committee B10.

Sincerely,



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