

3M Library Systems

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November 9, 1998

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:

This letter is written in support of the proposal by 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. Present FCC regulations governing these devices are significantly more restrictive than the corresponding European regulations. These more restrictive regulations have at least two undesirable consequences. First, RFID products used in the United States operate at greatly reduced range compared to those operated in Europe. This has the affect of precluding the use of radio frequency identification systems in certain product areas for which they are otherwise well suited. Second, the disparity between US and European regulations imposes an additional burden on suppliers of RFID equipment which will have the net result of slowing the widespread adoption of this technology. Internationally compatible standards for radio frequency identification devices are needed to relieve this burden and foster the growth of this technology.

We envision many product applications for RFID technology in areas such as object tracking, item location, inventory management, access control, etc. Most of these applications would benefit from the longer reading ranges which would be possible under the amended regulations. Some of the applications will be difficult to commercialize without this longer read range. Because of the benefits that RFID technology can provide to a wide range of users, we feel it is in the public interest to facilitate the adoption of this technology through the proposed amendment to the FCC regulations.

Accordingly, we ask the FCC to issue a notice of proposed rule making that would amend Section 15.225 of the rules as requested by Committee B10.

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Sincerely,



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