

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Amendment of the Commission's Rules)	RM-10051
to Permit Broader Data Transmission)	
Capabilities)	

COMMENTS OF ORACLE CORPORATION

Oracle Corporation supports the SAVI Technology request for amendment of the Commission Rules to permit broader data transmission capabilities for unlicensed Part 15 devices. Through its corporate Venture Fund, Oracle has made strategic investments in dozens of technology companies, including SAVI. Oracle supports SAVI's request because it is of significant benefit to Oracle's customers, and supply chain application software providers, to have complete visibility of where transportation containers and their contents are throughout the transport system. To most effectively meet these goals, a material tracking system should have a global database and RFID system. The proposed SAVI system would allow the location of any item that has an associated SAVI tag to be queried, identified and located at the ocean ports and distribution centers in the transportation chain, greatly simplifying the shipping and tracking process.

The current SAVI product certainly is a step in the right direction of more efficient shipping tracking. However, as stated in the SAVI request, there exists a need for greater amounts of data on the tags and a capability for an RF link to capture and load data to better optimize the current system. Increasing the Part 15 duty factor, while maintaining the same field intensity of the existing system, increases the utility of the SAVI system while maintaining the

same operating range. This allows the full capability of the system to be used to provide complete visibility of the container location and contents of the containers when required.

Thus, the longer duty cycle increases the efficiency and speed in handling the material transported in the commercial supply chains throughout the world. This in turn will allow the full use of existing port and warehouse facilities without the need for costly expansions. The faster, better and more cost effective service that we will be able to offer using the full capabilities of a SAVI RFID system will benefit the U.S. consumer through lower transportation, distribution and logistics costs.

Oracle Corporation fully supports favorable consideration of the SAVI petition to the FCC for increased duty cycle capabilities without reduction in the 100 meter operating range of the current system.

Respectfully submitted,

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Feb 29, 2001