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Ms. Magalie Roman Salas, Secretaty,
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Ref: ET Docket No. 01-278

These comments address compatability, due to lack of mutual interference, between an Amateur Radio HT and the Savi RF Identification system in the 430 to 440 MHz frequeny range. Also a comment on Savi's need for a frequency in this general frequency range.

I carefully observed a demonstration of the Savi Interogator and Tags transfering data while, within two feet of an Amateur 70 cm HT, with no interference. The Savi equipment didn't even break the HT squelch. The Savi equipment operates at a frequency of 433.92 MHz and the HT was tuned to a couple frequencies on and near this frequency.

The Savi uses FSK with a shift of 70 KHz. The baud rate is apparently 10 Kb/s or higher. The HT uses FM voice modulation with a peak deviation limited to the highest audio frequency, of 3 to 5KHz.

The Savi signal is spread over a bandwidth of nearly 100 KHz while the HT bandwidth should be less than 10 KHz. The baud rate of the Savi system is several times the highest frequency passed by the HT. This seems to be a far more important factor than the FM capture effect. Also the AGC and squelch circuits apparently contribute to the complete lack of interference.

I have been informed that a Savi Interogator can communicate with a TAG on the far side of a Container, which is an important feature. Apparently this is a due to diffraction and/or skin currents in the Container. Substantially higher or lower frequencies have more propagation loss.

In my opinion, adoption of the Proposed Rule Making and Order in ET Docket 01-278 will not result in interference with Amateur Radio's continued operation in the 430-440 MHz band. On the other hand it will allow realizing a large public benefit to both Military and commercial shippers.

I have been a licensed Amateur Radio operator since 1935. I owe ham radio a debt for helping me into my chosen career. I

have tried to repay this debt by writing numerous technical articles for CQ, QST, and QEX. I spent my 50 year career in the design and development of radio communication and broadcast equipment. I served on several standards committees for both Commercial and Military equipment. For example, I served on the MIL-STD-188C committee which established SSB equipment standards for all Military services. I also served two 3 year terms on the CCIR US Study Group I which studied such matters as spectrum utilization.

Respectfully,

Warren B. Breare