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December 4, 2003

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FILED ELECTRONICALLY

Edmond Thomas
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex parte presentation in ET Docket No. 01-278

Dear Ed:

Savi Technology, Inc. ("Savi") as the petitioner in this docket seeking minor modifications to the Commission's rules to allow enhanced radiofrequency identification products in the 433.5 to 434.5 MHz band, herein proposes an additional registration requirement for such devices.

As the Commission is aware, Savi has been attempting to receive Commission approval of a minor change to the Part 15 rules to permit increased duty cycles for its RFID equipment for more than three years.¹ During this three year period, Savi has had a series of meetings with NTIA staff, including a detailed technical briefing for the Interdepartment Radio Advisory Committee in February of 2001, whose members represent all the affected Government users. Savi has brought this rule change to the Commission in response to requests by its Government users, most notably the Department of Army. These users have requested an increase in the duty cycle of communications between a single RFID interrogator and tag to expedite the time needed to upload and download 128 kilobytes of data between the tag and interrogator. Additionally, in the intervening three years, critical homeland security efforts have arisen that are ideally suited to the Savi RFID product. In particular, the Savi RFID tags can be placed on commercial shipping containers, along with an electronic seal, to ensure that these containers are not tampered with during shipments. An increase in the duty cycle limitations will enable Savi to provide the needed functionality to the Army, as well as permit the commercial deployment of RFID products that will increase the security and visibility of commercial containers.

¹ See Savi Technology petition for rule making filed November 22, 2000, RM-10051.

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Throughout this process, Savi has attempted to compromise with the DOD to obtain the needed FCC rule changes. To attempt to further alleviate any DOD concerns, Savi now proposes that RFID products operating under the new relaxed duty cycle requirements be required to keep a registration log of their planned and current operations. Savi proposes that a web site be maintained by any equipment manufacturer or provider of RFID services that will list all active and in process installations. These listings will be categorized by state and will identify the base, port, facility, etc. As such listings would likely be company sensitive information, access would be restricted by either a password provided to appropriate parties or limiting access to those with .mil, .ntia.gov, or .fcc.gov email addresses. The web site would also be required to include point of contact information, in the event any questions or coordination requirements arise.

Savi believes with this registration process in place, the Commission may move forward expeditiously to complete the rule making process governing RFID use of the 433.5 to 434.5 MHz band.

Sincerely,

/s/ Robert L. Pettit

Robert L. Pettit
Counsel to Savi Technology, Inc.

cc: Mr. Julius Knapp
Ms. Karen Rackley
Mr. Hugh Van Tuyl