

June 8, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: ET Docket No. 06-103

Dear Ms. Dortch:

My purpose in writing you today it to encourage the FCC to provide the waiver request for an additional 12dB signal gain for Ultra-Wide Band (UWB) systems for asset tracking submitted by Multispectral Solutions, Inc. This additional signal strength dramatically improves the functionality of the system, especially for the identification and tracking of livestock. I serve as a State Beef Extension Specialist at the University of Missouri-Columbia and work in the beef industry as an educator, researcher and producer.

A coordinated National Animal Identification System that provides 48-hour trace-back of livestock in the event of an outbreak of a foreign animal disease such as Foot and Mouth Disease is essential to protect the nation's livestock inventory. It has been estimated that within thirty days, without knowing movement of animals during the first five days of an outbreak, approximately 24 million beef cattle could become infected. Animals in forty states could be affected. A disease outbreak caused by a highly contagious pathogen has the ability to significantly disrupt the nation's supply of domestically produced wholesome food, not to mention the catastrophic effects billions of dollars of losses in the livestock industries would have on the rural economies, families and businesses in the U.S. The beef industry alone accounts for approximately 100 million animals in the U.S. with \$ 49.2 billion in cash receipts during 2005 according to USDA. The cattle and calf receipts accounted for approximately 20% of all U.S. farm receipts in 2005, making the beef industry the largest single segment of the US farm economy. The beef industry easily creates an excess of \$100 billion in economic activity each year.

Although the USDA has initiated plans for NAIS, it has not been fully implemented. NAIS continues to be debated in Congress and across the country. NAIS has been recently reviewed and legislation proposed by Congress. Most of the commercial efforts to identify and trace animals through the production chain and proposed for NAIS have focused on passive electronic identification (EID) systems. While suitable for some management applications, passive EID is currently not capable of meeting NAIS needs of a 48-hour trace-back system without substantially slowing the speed of commerce in the production chain. Some question the ability at any speed. A technology backbone for NAIS needs to be capable of handling commerce and movement of all cattle in the U.S. at a typical speed of commerce. The use of UWB systems for active identification systems has been proposed and is the only technology with future capability to meet operational requirements. Currently, the UWB tags are emitting a signal at 30 milliwatts as limited by current FCC regulation. I would urge the FCC to allow an additional 12 dB gain for tracking livestock making UWB systems ideal for NAIS. Specifically, I encourage the FCC to grant a waiver of the Commission's rules Part 15.250, as requested by Multispectral Solutions, Inc.

Thank you for your attention to this important matter and your thoughtful consideration of my comments.

Sincerely,



Robert L. Weaber, Ph.D., PAS
State Extension Specialist-Beef Genetics