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ATTORNEYS AT LAW

7 September 2006

Ex Parte - Via Electronic Filing

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Multispectral Solutions, Inc. Request for Waiver of Part 15 Rules*, ET Docket No.
06-103

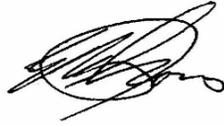
Dear Ms. Dortch:

On September 7, 2006, Robert Mulloy, and the undersigned met with the following FCC,
Office of Engineering and Technology staff members:

Julius Knapp,
William Lane,
John Reed,
Karen Rackley,
Alan Scime,
Ira Keltz,
Alan Stillwell,
Geraldine Matise,
Ron Repasi,
John Kennedy.

The purpose of the meeting was to discuss the above mentioned Waiver Request. The attached handout was used as part of the discussion and left with the staff.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Edmond J. Thomas', written in a cursive style.

Edmond J. Thomas
Policy Advisor and Partner

cc: Julius Knapp
Robert Mulloy

Multispectral Solutions, Inc.

OET Meeting
September 7, 2006

Background

- Experimental License 0175-EX-PL-2005 granted on 7/20/2005 for Cherry Point Refinery use of 50 new UWB tags.
- Experimental License 0038-EX-ML-2006 filed on 3/28/2005 for 5000 higher powered tags (pending)
- Waiver request for limited use of new UWB tags submitted on April 12, 2006

Industrial Safety Requirement to Locate Personnel at Risk



MSSI Waiver Request

ET Docket No. 06-103

- Modify 15.250(d)(3) to read: “The peak EIRP limit is $12.75 + 20\log(\text{RBW}/50)$ dBm where RBW is the resolution bandwidth in megahertz that is employed by the measurement instrument. RBW shall not be lower than 1 MHz or greater than 50 MHz.”
- **Average power limits do not change**
- Specific applications include:
 - (i) the tracking and identification of assets and personnel in petrochemical facilities, and (ii) the tracking and identification of livestock.

New Tag Performance

- Significant advantage over current Section 15.250 limits (0dBm/50MHz) in severe multipath environments
 - Enhance personnel counts to meet OSHA requirements for accurate accountability
 - Real-time localization to within one foot for time urgent rescue operations

Localization Coverage

New Tag

PAL 650 Tag Locator Demo (version 4.01)

Play Mode Configure

Playback from a log file: Browse

GUI Raw Data Areas Search

GUI Data Source

2

3D Data
2D Data
1D Data

ith

1313-01/02
1313-03/04
1315
1322-01/02

01 M 1524
02 CM 01

01 M 1508
02 T 04 03

ANALYZER
1204 1901 1902
153

Text Color: RED

Tag Icon Size: 16

Zoom In Zoom Out

Localization Coverage FCC 15.250 Certified Tag

The screenshot displays the 'PAL 650 Tag Locator Demo (version 4.0)' software interface. The main window shows a site plan with several buildings and streets. The buildings are labeled 'REFORMER UNIT 11', 'MAIN CNTRL ROOM', and '#2 FIRE HALL'. The streets are labeled '7th STREET', '8th STREET', 'AVENUE D', and 'BROWN RD'. A north arrow is visible in the top left corner of the site plan. The interface includes a 'Play Mode' button and a 'Configure' button. Below these is a 'Playback from a log file:' field with a 'Browse' button. On the right side, there are several control panels. The 'GUI' panel has tabs for 'Raw Data', 'Areas', and 'Search'. The 'GUI Data Source' panel includes an 'Averaging weight:' dropdown set to '0.2' and 'Data Types:' checkboxes for '3D Data', '2D Data', and '1D Data'. The 'Display Options' panel has checkboxes for 'Keep aspect ratio', 'Show a background grid with spacing of 4 feet', 'Show receivers', 'Show reference tag', 'Show corner coordinates', and 'Show tag ID'. The 'Text Size:' dropdown is set to '12' and the 'Text Color:' dropdown is set to 'RED'. The 'Tag Icon Size:' dropdown is set to '8'. At the bottom right, there are 'Zoom In' and 'Zoom Out' buttons. A tooltip is visible over the site plan, stating: 'Single-click on a tag icon to display its ID and coordinates, or Double-click to display its name and picture (if they have been assigned)'. The title bar of the window reads 'PAL 650 Tag Locator Demo (version 4.0)'.

The Problem

No FCC action on MSSSI's waiver
Request.

General Discussion