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March 21, 2002

Mr. James Burtle
FCC Office of Engineering Technology
Experimental Licensing Branch
7435 Oakland Mills Road
Columbia, Maryland 21046

Subject: STA Request for Kinsale, VA

Mr. Burtle:

Please see the accompanying STA request for use of the Maxrad MP8906PT antenna with the Intermec UAP2100 RFID interrogator (900 MHz) at a Marconi customer site in Kinsale, VA. The Intermec interrogator has already been certified by the FCC (ref.: HN2UAPRFID-900). However, the Maxrad antenna is not part of the existing grant. A Permissive Change Request for adding the antenna to the grant was submitted by Intermec on 3/12/02 (ref.: 13EA494837) and is currently under review by the FCC. Marconi intends to use this interrogator/antenna combination in asset tracking applications at a customer facility in Kinsale, VA and is requesting STA for use during the review period.

Marconi is requesting an expedited review of the STA request for the following reasons:

1. The Maxrad antenna is similar in type and gain to the Cushcraft S9028PC antenna that is already part of the existing grant.
2. Submittal of this STA request was delayed approximately one month due to a misunderstanding regarding the requirements for adding antennas to the existing grant. It was Marconi's understanding that if a new antenna was similar in type, and of equal or lesser gain than one that was already included in the grant, the new antenna could be added via a letter of notification to the FCC. This erroneous assumption was based upon reported conversations between the original grant holder (Intermec) and representatives of the FCC licensing branch. A letter of notification from Kursat Eroglu of Intermec was submitted to Richard Fabina of the FCC on 2/19/02. At that point, Marconi believed that the interrogator/antenna combination was legally part of the UAP2100 grant and did not consider an STA necessary. Since that time Intermec has been informed that such a letter is not sufficient. Intermec has subsequently submitted the Permissive Change Request referenced above.
3. The delays caused by the misunderstanding and the required time for reviewing the Permissive Change Request have caused Marconi to delay the completion of program requirements with the customer.

A prompt response to this request would be greatly appreciated. If there are any questions or concerns please do not hesitate to contact the undersigned.

Best Regards,

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