



Office of the Director of Public Affairs

1301 K Street, Northwest, Suite 1200
Washington, DC 20005 3307

June 27, 2006

RECEIVED

JUN 27 2006

Federal Communications Commission
Office of Secretary

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

RE: ET Docket No. 06-103

Dear Ms. Dortch:

I am writing in support of the Multispectral Solutions, Inc. (MSSI) request for a waiver of Part 15.250 of the Commission's rules to allow for the use of higher power ultra wideband (UWB) RFID tags for personnel accounting and safety in the refinery environment.

In 2005, MSSI requested and was granted an Experimental License from the FCC to utilize higher power UWB RFID tags at a petrochemical facility operated by BP. Working in collaboration with engineers from MSSI and BP's Cherry Point Refinery in Blaine, Washington, IBM has witnessed the success of higher power UWB RFID tags in providing accurate, real-time personnel location capability within the dense metallic environment of a refinery. This new system should help BP increase worker safety, and reduce risk to emergency responders in an evacuation.

Data collected during operation of the higher power tags indicate infrastructure costs could be reduced while maintaining reliable tracking coverage. In addition, in the experiment, the higher power UWB tags, operating in the 6 GHz band, did not cause any interference to existing wireless infrastructure (e.g., on-site 802.11 networks) or other systems.

Therefore, I urge the Commission to permit the use of higher power tags as requested by MSSI in their request for waiver in the above referenced docket.

Sincerely,

Steven W. Stewart

SWS:cb

cc: Mr. Julius Knapp, Deputy Chief, FCC OET
Mr. John Feed, Sr. Engineer, FCC OET