

**Savi Technology, Inc.  
615 Tasman Dr.  
Sunnyvale, CA 94089**

March 21, 2002

**Via Electronic Filing**

Equipment Authorization Branch  
Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

Re: FCC ID: KL7-612T-V1

Ladies and Gentlemen:

The above referenced application, the TCB grant for which was set aside on January 16, 2002, is hereby amended to reflect operation in accordance with Section 15.231(e). As described below, Savi no longer proposes that any portion of the operation be conducted under Section 15.231(a) of the Rules.

Savi proposes to modify the tag protocol so that the system would operate in compliance with the provisions of Section 15.231(e) without resorting to Section 15.231(a). These changes would result in the limiting of tag transmission to a maximum period of one second with silent periods of at least 30 times the duration of the transmission, but in no case less than 10 seconds. The reduced field strength levels mandated by Section 15.231(e) would be met by virtue of the protocol duty cycle and average emissions measurements per Section 15.35. Thus, while the maximum duration of any transmission of the messages from the tag is one second, within any 100 ms portion of that one second period the maximum on-air time would be 10 ms. As a result, the maximum field strength would be derated by a factor of 0.10.

The changes would be made in the firmware inside the tag. This firmware is not user-adjustable. A revised Theory of Operation document has been prepared and is being submitted with this letter of amendment. I believe the confidential treatment of the Theory of Operation is covered by the letter of November 30, 2001, submitted with the application to American Telecommunication Certification Body, Inc., which requested such treatment for the Theory of Operation. If a separate letter is now needed, please let me know.

The basic oscillator circuit in the tag has not changed. As such, the maximum measured field strength set forth in the original test report remains applicable. Those measurements showed a maximum transmit time of 10 milliseconds within any 100 milliseconds. The maximum fundamental at 433.920 MHz was 92.6 dBuV/m peak at 3 meters and 72.6 dBuV/m average as calculated by subtracting 20 dB from the peak reading. The 20 dB factor was derived under Section 15.35(c) as  $20 \log 10/100$ . See page 7 of the EMC Test Data Appendix to the Elliot Labs Test Report. Given the duty cycle of a maximum on air time of 10 milliseconds within any 100 milliseconds, the calculated maximum field limit under Section 15.231(e) is 72.8 dBuV/m at 3 meters (92.8 dBuV/m peak). Accordingly, the measured data show compliance with Section 15.231(e).

The same units, if tested to the new protocol, would have these values in compliance with Section 15.231(e).

Should any questions arise, please contact me or our counsel David Hilliard of Wiley Rein & Fielding LLP (202-719-7058 or [dhilliard@wrf.com](mailto:dhilliard@wrf.com)).

Respectfully,

/s/ *Rod Thorne*

Rod Thorne  
VP, Network Products  
Executive for Compliance

Encl. Revised Theory of Operation (submitted separately)