

RE: Savi Technology, FCC ID: KL7-612T-V2

The following addresses each of the issues raised in the comments letter from ATCB dated on December 9th, 2001.

1) Photographs may not be held confidential based only upon on the basis of trade secrets. Please remove the request for photographs from the letter of confidentiality or provide a better justification.

The confidentiality request has been updated to remove photographs from its scope. The revised letter has been uploaded to the ATCB website.

2) The theory of operation provided information with respect to meeting the requirements of 15.231(a). However, the information provided does not appear to meet the current requirements of 15.231(a). In specific please address the following concerns:

a) Beacon Mode: This mode appears to contain periodic transmissions at regular intervals (15.231(a)(3)). This is not permitted except for polling of supervision transmissions (which is allowed only for security or safety applications). Please explain how this unit meets these requirements and what type of information is contained within this data pulse. Also, the transmission rate stated exceeds the rate allowed by this section (1 transmission per hour).

The Beacon Mode should fall under the requirements of 5.231(e). The test report and data have been updated to reflect the evaluation of the transmissions from the unit against the field strength limit of 15.231(e). The Theory of Operations has also been updated to show that Beacon Mode meets the requirements of 15.231(e).

Both Theory of Operations and Test Report have been loaded to the ATCB web site with the word "REVISED" appended to their filename.

b) Signpost Mode: The information provided exceeds the 5 second transmission duration allowed by 15.231(a)(1) or 15.231(a)(2). Also, the transmission of signpost ID's could be considered to be data since they are not inherent to the tag itself.

Savi considers Signpost Mode transmissions to be individual and random. Each individual transmission contains the same information and should comply because it is less than 5 seconds in duration. Since these transmissions are random and not periodic, the 1 per hour restriction should not apply.

Further, the transmission is only of a unique recognition code that includes both the Tag and Signpost IDs. The combination of these codes is unique to the Tag and determines what controls are implemented by the system.

c) Information available on Savi Technology's website regarding this system states the tags communicate their location, unique ID, and other application data. This implies more transmission than is allowed by 15.231(a).

Modifications will be made to the marketing document "Savi Series 600 RFID System" located on the SAVI website to remove the confusing statements concerning communication transmissions. The phrase "and other application data" will be removed and the term "unique identifier" will be replaced with "unique recognition code".



3) Information given in the application for the reader suggests that some tags can communicate with a collection mode as well. Is this applicable to this tag? Please comment on this issue.

The 604 Tag cannot communicate in a collection mode. They can only communicate in the Beacon Mode and Signpost mode as detailed in the Theory of operations as they do not incorporate a 433 MHz receiver.

4) Information in the manual shows the same FCC ID for both the ST-604 & ST-605 models while most information presented (i.e., photographs, test report, etc.) presented in the application supports only the model ST-604. The schematic diagram also shows different population of the board for various options. Please comment.

The application is for the ST-604. Savi hope to share the same FCC ID with the 605 Tag as they share the same rf circuitry. The 605 Tag utilizes some of the optional components to add an extra function. Once the 605 Tag has been tested it is hoped to submit an application for a Permissive Change to the existing FCC ID requested for the 604 Tag

5) FYI, the information requested in item 2) will need to be provided before a final the review of the test report can be completed.

This is noted.

If you have any further questions or need clarification on any of the points raised above, please contact me via doc@elliottlabs.com.

Regards,

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