



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

December 9, 2001

RE: Savi Technology

FCC ID: KL7-612T-V2

After a review of the submitted information, I have a few comments on the above referenced Application.

- 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. As an alternative, you may use a black marker to "black out" the top of any readable components and provide new internal photographs. Please provide feedback with respect to this issue.
- 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).
 - 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.
 - 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).
- 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.
- 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.
- 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.

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Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.