

January 30, 2008

RE: Savi Technology, Inc., FCC ID: KL7-696T-V1
Attention: Tim Johnson

Please find our responses to your comments on this application below:

1) For FCC: 731 Form cites this is a Class 2 Permissive Change application. However review of the FCC site and information uploaded appears to suggest this is a new original Certification. Please clarify and correct any exhibits.

For IC: IC Form cites this is an Existing Family application (in addition to Single application). However review of the IC site and information uploaded appears to suggest this is only a new single application. Please clarify and correct any exhibits.

Our apologies for the confusion, these are indeed new certifications and the ATCB form 731 and Industry Canada forms have been revised and uploaded (filenames are *ATCB Form 731 _15.240 rev2.pdf*, *ATCB Form 731 _15.231_rev2.pdf* and *ATCB-Appendix I and II rev2.pdf*)

2) Due to the Canadian Freedom of Information Act, a confidentiality letter should also be provided with the application for Canada.

As duly authorized agent I have uploaded a request to Industry Canada /ATCB that they hold the block Diagram, Operational Description and Schematics confidential and out of the public realm. The file is *Request for IC Confidentiality.pdf*.

3) Operational description provided cites an antenna gain of 8.41 dBi for the 1900 MHz Siemens module. Note that this is higher than allowed in its grant for authorization (4.4 dBi). Please review.

The value of 8.41dBi was taken from preliminary information from the module manufacturer, which is inconsistent with the grant notes.

The operational description has been updated to reflect the correct 4.4dBi value and the revised file has been uploaded (*ST-696-001 Operational Description Final_1-29-08.pdf*)

4) RF exposure for IC mentions 8.41 dBi as well.

The value of 8.41dBi was taken from the MPE calculation on file as the RF Exposure exhibit for the module's FCC approval. As this calculation is the basis for the RSS-102 attestation it allows for a gain of 8.41dBi for the evaluation of the rf exposure hazard. As the gain is limited by grant notes to 4.4dBi the RSS-102 form has been updated to indicate that the maximum gain that will be used will be 4.4dBi. the uploaded file is *ST-696 RSS-102 RF Exposure Jan 30.pdf*.

5) Cal due dates for general digital device emissions in the 15.231 report appear odd.

Excel had decided to display the date in number rather than date format. This has been corrected and the complete report uploaded as *R70128 _FCC 15.231 Revised.pdf*.

6) FCC has typically required data to confirm the timing requirements utilized. For instance, 10% duty, 25% duty, 5 second limitation, minimum 10 second between 15.231(e) transmissions and 15.240 10 second silent period, < 60 sec. transmit for 15.240, etc.

The last applications for the Savi tags have relied on the description of the protocol in the operational description for the justification for the use of duty cycle correction factors to calculate the average field strength of emissions and for demonstrating compliance with the 15.231(a),(e) and 15.240 timing requirements.

The protocol was also described to the FCC and considered acceptable by the FCC –please refer to the two documents that should have been uploaded with the filing titled: *SAVI PUBLIC JK Letter from FCC - To Be included in Filing.pdf* and *FW SAVI PUBLIC JK Letter2a4.pdf*.

We respectfully request you to accept the operational description for the protocol as adequate support for the timing requirements.

7) A few measurements utilized a QP detector (i.e. second harmonic during TX). For this to be used, the device must ensure there is a 20 Hz rep rate or greater during testing. Please explain.

The second harmonic was measured using a QP detector as permitted by the rules for emissions between 30 MHz and 1000 MHz. During testing, and as detailed in the test report, the device was transmitting continuously a modulated signal, therefore there were no issues with a pulse rep rate causing incorrect weighting of the QP detector. All average readings were calculated from the measured peak value of the signal being measured based on the protocol-based duty cycles.

Thank you for your comments, please advise if you need additional information.

Regards,

Mark Briggs

Staff EMC Engineer

Documents uploaded:

R70128 _FCC 15.231 Revised.pdf
ATCB Form 731 _15.231_rev2.pdf
ST-696-001 Operational Description Final_1-29-08.pdf
IC Confidentiality.pdf

FW SAVI PUBLIC JK Letter2a4.pdf

ATCB Form 731 _15.240 rev2.pdf
ATCB-Appendix I and II rev2.pdf
ST-696 RSS-102 RF Exposure Jan 30.pdf
SAVI PUBLIC JK Letter from FCC - To Be included in Filing.pdf