

Consultation in Relation to RFID in the 916.1-918.9 MHz band

Sensormatic is a major global supplier of retail security solutions, which includes the use of RFID Systems in Europe (including France). We have long promoted the use of the 3 channels in the 916.1-918.9 MHz band for solutions at 4W and we greatly appreciate the opportunity to contribute to this consultation in France. These 3 channels will allow implementation of new RFID applications and the potential for a performance improvement in some existing applications. It will also assist by allowing more harmonised solutions for our global customers because of the more global availability of frequencies in bands around 915MHz

We believe using these bands will open up new opportunities for well performing RFID security solutions that could be difficult to achieve without. We do, however, recognise that there are some concerns about possible interference with systems using the adjacent bands and we have worked alongside others in the community to find a suitable consensus. In order to try and alleviate such concerns it could be possible operate using a notification regime in France. If such a regime were introduced, we would appreciate if this could be as minimalist as possible.

We would respectfully suggest that the following would help to minimise the organisational impact:

- The notification would only be needed when a system power level exceeded (or was likely to exceed) 2W. This is similar to the power level allowed in the lower 866MHz band, and so only new higher power solutions would be notified. This should make it easier for both ourselves and the Authorities in France to more easily identify a location should any unexpected interference occur.
- It would be easier to just notify each of the site locations, rather than all of the system configurations on each site. Solutions are generally based on customer configurations and would often be installed on a scheduled basis across multiple sites. The exact configuration in each site may be slightly different and only some of the installed systems would need to operate at the highest power. In the case of an interference, the Authorities would only need to be aware of the site location and a contact point, so that any issues can be looked at. The number of systems on the site is not critical since the individual systems may not all operate for all of the time and may not all operate at high power.
- Keeping any notification or declaration simple would mean that the information would not need updating every time there was a change on the customer site. This would be simpler for installers and users. It would reduce the maintenance overheads and costs for the French Authorities as well.

In conclusion, we appreciate the effort being made to allow the use of the 3 higher power channels in the 916.1-918.9 MHz band in France because of the added benefits and opportunities it would offer in our solutions. A simple declaration or notification scheme for higher power RFID implementations could work, although we firmly believe there will be very few incidences of interference to adjacent channels.



Ian Brooker
Senior Manager, Regulatory Engineering
Phone: +44 (0)1462 667733
E-mail: ian.brooker@jci.com

Sensormatic LLC
c/o Johnson Controls, Works Road
Letchworth, Hertfordshire, SG6 1FF
UK