

From: John Logan

To: John Kennedy  
Date: June 05, 2008

Subject: FCC File # 0291-EX-ST-2008

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Message:

6/5/2008

Mr. Kennedy:

On behalf of Elster Integrated Solutions, LLC (?Elster?), we hereby provide additional information for Special Temporary Authority requests 0275-EX-ST-2008 (?Virginia STA Request?) and 0291-EX-ST-2008 (?Louisiana STA Request?). Specifically, we provide further description of Elster?s end-of-testing policies regarding retrieval of any uncertified devices and/or proper labeling of devices certified by the Federal Communications Commission by the end of the testing periods.

As stated in our previous communications, Elster will maintain sole responsibility for end-of-testing removal or relabeling of experimental devices and will not delegate its responsibility to the utility or the home owner. Mr. Chris Kozlowski (or a successor employee should Mr. Kozlowski leave his position) will be responsible for this task.

To accomplish the installation, retrieval, and/or re-labeling of devices for both the Virginia STA Request and Louisiana STA Request, a well-respected energy industry installation implementation contractor, GoodCents Solutions, will be utilized. For more than 28 years, GoodCents has managed utility-sponsored residential installation programs. For more information on GoodCents? excellent track record, please see [www.GoodCents.com](http://www.GoodCents.com).

GoodCents was chosen for installation and end-of-testing revisits to residential locations as the most efficient, secure, and effective means to fulfill its pilot test and STA obligations. GoodCents has extensive experience with the residential installation of electric utility-related equipment, maintains employees familiar with residential installation, and has an established tracking program for identifying residential customer equipment that will ensure the proper removal and disposition of equipment at the conclusion of the experimental periods. As both the installation and end-of-testing contractor, GoodCents will have utmost familiarity with the project, product, and locations that makes it the most qualified contractor to retrieve or re-label the devices quickly, efficiently, and properly.

Elster will implement a tracking program to maintain data on compliance status for the devices authorized under the Virginia STA Request and Louisiana STA Request. Using GoodCents at both the installation and end-of-testing stages allows Elster to easily track where and how many devices have been installed, removed, and/or re-labeled based on unique serial numbers assigned to each device. Elster will maintain data on the tracking numbers of each unit installed, the installation location(s) of the device(s), and the status of each unit?s potential FCC certification.

In conclusion, Elster will remain ultimately responsible to ensure the end-of-testing retrieval or re-labeling is properly completed, using the best-available and most qualified resources (GoodCents) to complete that task.

Respectfully Submitted,  
John S. Logan