

### Narrative Statement of the Proposed Experimentation

Kamstrup requests experimental authority to operate prototype telemetry equipment that it is developing for U.S. utilities. Accordingly, this request is for a conventional experimental authority pursuant to Section 5.54(a) of the Commission's Rules for a product development trial, or a market trial.<sup>1</sup> Experimental authorization is necessary for Kamstrup to operate the equipment as part of trials with utilities to demonstrate the capabilities of the telemetry equipment. The trials will take place with various utilities and accordingly, blanket experimental authority is requested to operate in various locations in the United States. Blanket authority will provide flexibility that is needed to conduct these trials with the utilities that will be participating in the trials. While Kamstrup requests blanket authority the trials would be limited in scope, and Kamstrup has limited its request to authorize the operation of 300 telemetry devices under the trial. The devices would be used for temporary fixed operations; would not be left behind with the utility in the area of the trial; and would always be accompanied by a Kamstrup representative operating the transmitter. The specific objective to be accomplished by the trial is to measure the performance of the equipment in the field and to demonstrate its capability to meet utility requirements for functionality, reliability, safety and security. The experimental trial would have the reasonable promise of contribution to the development, extension, expansion or utilization of the radio art and is unique because it would demonstrate innovative approaches to utilizing licensed spectrum that is allocated for FCC Part 90 private land mobile radio operations to provide greater coverage and reliability for utility telemetry applications. In addition, the output power of the base stations and remote meters will comply with the FCC's Part 90 rules.

For all of these reasons, Kamstrup respectfully requests blanket experimental authority to operate prototype telemetry equipment for use in trials with utilities to demonstrate the performance of the equipment as part of a product development and market trial.

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<sup>1</sup> See 47 C.F.R. §5.54 (stating that a conventional experimental radio license "is issued for a specific research or experimentation project (or a series of closely-related research or experimentation projects), a product development trial, or a market trial.")