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April 28, 2011

Via E-mail and U.S. Mail
James.Burtle@fcc.gov

Mr. James Burtle, Chief
Experimental Licensing Branch
Electromagnetic Compatibility Division
Federal Communications Commission
445-12th Street, S.W.
Washington, D.C. 20554

Re: Granted Experimental Authorization WF2XNH and Pending
Modification Application 0010-EX-ML-2011; Sensus Spectrum, LLC

Dear Mr. Burtle:

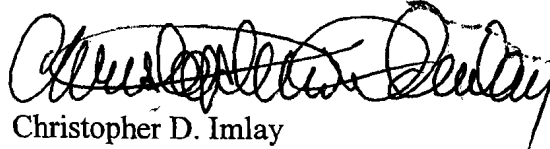
Your office granted in September of 2010 the above-referenced experimental authorization to Sensus Spectrum, LLC of McLean, Virginia. The company now has an application on file for modification of that authorization to add certain experimental locations to the existing authorization. ARRL, the national association for Amateur Radio is very much concerned about this authorization and the license granted to this company, because it specifies narrowband operation at exceptionally high power in a frequency band allocated to the Amateur Radio Service (420-430 MHz) and used daily and regularly by Amateur Radio licensees. Because the license and the modification application offer no provision whatsoever for coordination with, or for protection of licensees in the Amateur Radio Service against harmful interference, ARRL requests that this authorization be cancelled and the modification application dismissed.

WF2XNH permits experimental mobile operation for a two-year period at six specific locations using a 4K81FXD emission with 13-FSK modulation at effective radiated power of **50 watts**. At one location, Covington, Louisiana, the radius of operation is 24 kilometers. The other locations include Uniontown, PA; Goleta, CA; Forest Hills, PA; Boise, ID; and Morrisville, NC. The interference contour of these signals is exceptionally large. The pending modification application would add to this an additional location at Plano, TX at 35 watts ERP. The equipment is stated to be incapable of station identification. The stated purpose is to permit testing of Smart Grid devices.

Operation as specified will inevitably cause harmful interference to ongoing Amateur Radio operations in the band 420-430 MHz, and the interference victims will be incapable of identifying or reporting the source of the interference because that the experimental operation is mobile and unidentified. There is substantial Amateur Radio operation in the 420-430 MHz band, including Amateur television and repeater control links.

Although the present experimental grant specifies the normal non-interference requirement and a prohibition on development of equipment for operational use in this band, experimental operation as authorized and as proposed is fundamentally incompatible with ongoing licensed Amateur Radio operation and the authorization was improvidently granted. ARRL respectfully requests that it be rescinded without delay and the modification application denied.

Respectfully submitted,



Christopher D. Imlay
General Counsel, ARRL

Cc: Julius Knapp, OET
Stanton Woodcock, Sensus Spectrum
(via e-mail only)