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October 1, 2011

Federal Communications Commission
Gettysburg, PA

Subject: Response to Question 7

Dear Sirs,

Sensus USA is a manufacturer of Smart Grid devices for Critical Infrastructure utilities around the world. We presently have over 8 million endpoints in operation in the United States and Canada. While North American endpoints operate in the 900 MHz band on Narrowband PCS and MAS channels, our export products for Europe and the Middle East require operation at 410-430 MHz. Our base station products typically operate at 45 dBm output while our endpoints operate at 30 dBm output.

We are currently operating test units under an Experimental license (WF2XNH) at several of our engineering test and development sites throughout the US. Most facilities operate equipment in the lab on a bench without final amplification. However, in rare cases testing may be performed at full power with remote units located within a 1 km radius of the facility using omnidirectional antennas. Further technical information is supplied with our application.

At this location we plan to conduct developmental testing in the lab at the bench level without final stage amplification at our new facility below:

- 5808 Mercantile Dr W, Frederick, MD 21703
- Latitude: 39.391703 / Longitude: -77.446735

We respectfully request an experimental license so we can complete our engineering effort in developing endpoint products for export markets.

Sincerely,

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Todd R. Ellis, PMP
Senior Product Manager,
Radio Infrastructure and Spectrum Portfolio