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March 5, 2015

Federal Communications Commission
1270 Fairfield Road
Gettysburg, Pennsylvania 17325-7245

To whom it may concern:

The following is additional information regarding our need for a developmental license in the 450MHz to 470MHz frequency band, as per 47 CFR 90.517:

(a) The final objective: To develop new, specialized radio and antenna systems for the utility meter telemetry market. These may include antennas and radios which must transmit from at or below grade and in unusual environmental conditions which may only be tested in the actual field setting, and therefore we are unable to design and/or test these systems in a laboratory or workplace setting.

(b) Results of operation to date: We have been able to create new, innovative specialized radio and antenna systems which perform very well in harsh locations and under extreme conditions, including products designed to monitor leak conditions on underground water lines and products which are located below grade such as in basements or underground vaults.

(c) Analysis of the results obtained: Since our objective is ongoing research and development, no specific data and no “long term analysis” is performed. Our results are gauged by placing a unit in the field in a specific environment, and through guided trial and error we determine what design(s) give us the best field performance under those conditions. These tests typically take one or two days at most, involve relatively simple field operations, and the results obtained are typically “pass-fail” in nature.

(d) Copies of any published reports: No reports are published regarding these field operational tests.

(e) Need for continuation of the program: Aclara is one of the top three automatic meter reading system providers in the nation. We intend to continue to provide new and innovative designs for this industry now and for the foreseeable future. This developmental license is required to allow us to validate those new products in “real-world” environments.

(f) Number of hours of operation on each frequency: As per rule section 90.511, our field development work will not cause harmful interference to the operation of stations regularly licensed under any part of the Commission’s rules. In

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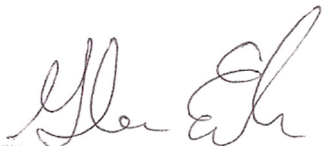
accordance with that rule, we will choose which of the two frequencies is best suited for testing in any given environment, and at only operate the station(s) for the time needed to determine whether our design is “passing” or “failing.” At such time, we will cease operations. The minimum operating period would likely be less than 30 minutes, the maximum would be 8 to 12 hours in a given area for a given test. The test schedule will vary but is not likely to last more than one or two days per week.

In closing, I hope that this letter provides sufficient detail regarding our application. Please feel free to contact me at any time.

Sincerely,



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