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August 22, 2019

Federal Communications Commission
Washington, DC

Subject: Correspondence, File No. 0201-EX-CM-2019, Confirmation #EL972216

Dear Sir or Madam,

Sensus 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, Canada, Europe, South America and Asia. Most of our North American endpoints operate in the 900 MHz band on Narrowband PCS and MAS channels, while equipment for many of our international customers operates in the 410-430 MHz band. Our base station products operate at 45 dBm output and below, while our endpoints operate at 30 dBm output.

We are currently operating test units under experimental license WF2XNH at nine 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.

We respectfully request a modification to this experimental license to add two additional testing locations so we can complete our engineering effort in developing endpoint products for export markets. At the new tenth and eleventh locations in DuBois, PA and Perimeter Park, Morrisville, NC, we also plan to primarily conduct developmental testing in the lab at the bench level without final stage amplification. However, we may on occasion perform tests at full power with remote units located within a 1 km radius of the facility using omnidirectional antennas.

Although this initial experimental license renewal request for these two new locations was for operation in the entire 410-430 MHz band, we should be able to adequately perform these tests within the 415-430 MHz band.

Please contact me if you have any questions regarding this matter.

Sincerely,

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Stanton B. Woodcock
Spectrum Manager