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July 29, 2019

Federal Communications Commission
Washington, DC

Subject: Question 7, File No. 0605-EX-CN-2019, Confirmation #EL445895

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 433-435 MHz and 868-870 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 multiple experimental licenses at many 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 short distance of the facility using omnidirectional antennas. Further technical information is supplied with our application.

We respectfully request a new experimental license to test endpoint transceivers at no more than 1 Watt in the 169 MHz band at six of our testing facilities within the United States to support new international clients in order to complete our engineering effort in developing endpoint products for export markets. At these locations, we 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 located within a short distance of the facility using omnidirectional antennas.

Thank you for your consideration in this matter. Please contact me if you have any questions regarding this matter.

Sincerely,

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Stanton B. Woodcock
Spectrum Manager