

August 2, 2019

Federal Communications Commission
Washington, DC

Subject: Question 7, File No. 0611-EX-CN-2019, Confirmation #EL347266

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 and 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 400 MHz band. All of these Smart Grid devices utilize GPS for both location and network timing.

Sensus develops and performs product testing in its Morrisville, NC location consisting of multiple adjacent buildings within an office park. As part of this development and end-to-end product testing, it is essential to test GPS timing and location aspects of the system. In order to obtain adequate indoor GPS signals for testing throughout the lab and development facility, Sensus has come to realize that it requires the use of GPS repeaters. As a result of company growth and a need for additional development and testing, Sensus will be operating a second lab in a new building at 633 Davis Drive, adjacent to the initial building at 639 Davis Drive.

In 2017 Sensus was granted an experimental license under callsign WI2XTJ to operate the GLI Metro smart GPS amplifier system manufactured by GPS Source on the L1 channel to improve GPS signal levels within the 639 Davis Drive facility. This license was recently renewed for an additional 2 years.

Just as was done in the 639 Davis Drive building, Sensus would like to install a GPS Source amplifier system in the 633 Davis Drive facility. The external antenna will be roof mounted, and fed through the roof with 30 feet of LMR-195 coaxial cable to a fixed indoor location in the center of the development and testing lab. An omnidirectional antenna will be installed at this ceiling location. The experimental testing facility is located within a full time Sensus only office building and is occupied by Sensus employees and a test manager during system operation. The system will be powered off during evenings and weekends and/or any time the system is not in use. Sensus leases and utilizes as office space for its employees all buildings immediately surrounding these test facility locations. Sensus will notify all potentially impacted employees, that GPS information may be impacted for periods of time due to this GPS re-radiation system.

The Sensus “Stop Buzzer” point of contact for this device is:

Bill Farrow / Sr. Manager, Firmware Engineering

bill.farrow@xyleminc.com

919-813-4521 (o) / 919-809-9223 (m)

If Bill is not available for any reason, a secondary “Stop Buzzer” point of contact is:

Oliver Bacasse / Vice President - Chief Systems Architect

Oliver.Bacasse@xyleminc.com

919 376 2623 (o) / 919-614-8867 (m)

If Oliver is not available for any reason, a tertiary “Stop Buzzer” point of contact is:

Antonde Branch / Environment/Safety/Security & Facility Coordinator

Antonde.Branch@xyleminc.com

919-317-6393 (o) / 919-576-6185 (m)

As an additional emergency measure, Sensus has purchased and will deploy a Wi-Fi “smart” plug that will allow Frank, Oliver or Antonde to remotely turn off the GPS repeater from their smart phones.

We respectfully request an experimental license in order that we may continue development and testing of these units in our new 633 Davis Drive, Morrisville, NC facility.

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

Sincerely,

/ S /

Stanton B. Woodcock

Spectrum Manager