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August 31, 2012

Federal Communications Commission
Washington, DC

Subject: Form 442 Response to Question 7

Dear Sir or Madam,

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 most of our North American endpoints operate in the 900 MHz band on Narrowband PCS and MAS channels, and most of our export products for Europe and the Middle East operate in the 410-430 MHz band, we now have a potential international customer that will require operation in the 868 MHz band.

We are currently developing handheld units and would like to be able to begin testing these units at our 639 Davis Drive engineering facility. Tests will mostly check or verify electronic registers for our European market which uses a priority meter reading protocol as well as the wireless MBUS protocol. We expect most testing to take place in the lab within the building, but may perform some testing outdoors to determine unit range. Output power is nominally 25mW (14dBm). Although the RF chip supports up to 100mW (20dBm), we should never use this maximum power. To be conservative, we have listed power at 100 mW in our application.

We respectfully request an experimental license in order that we may continue development, testing or production of small quantities of these handheld units.

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

Sincerely,

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Stanton B. Woodcock
Spectrum Manager