Mr. Greg Czumak Application Processing Branch Equipment Authorization Division Federal Communications Commission 7435 Oakland Mills Road Columbia, MD 21046

Re: Class II Permissive Change FCCID: EO940GN-1 Itron Model #: 40WN

Dear Mr. Czumak:

This letter accompanies the electronic filing for a Class II permissive change related to the FCC ID listed above. The application requests Rule 15.249 certification of a device that is a utility meter reading module intended for use with water meters. The device uses essentially the same radio frequency circuitry as the device approved under FCC ID: EO940GN-1, that circuitry is merely mounted in a different housing to allow it to interface to water meters. This request is in line with our discussions during the meeting with Itron and yourself in late February, 1998.

Accompanying this filing are two documents, the first providing test results from our measurement facility in Waseca, MN. The second document provides photos of the device housing. We note that the device label depicted on page two of the photos document shows a label with older FCC information. This photo is included merely to show the location of the label and the new label will provide the appropriate FCC information once the certification is granted.

If you have any questions on this project, please contact me at (800) 441-1298 ext. 3323 or via email at klaus.bender@itron.com.

Sincerely,

Klaus Bender Project Manager Regulatory and Patents

**Enclosures:**