

July 7, 2005

Subject: Modular Approval FCC ID: EO9-53ESS IC ID: 864D-53ESS

Dear Sir or Madam:

This is a request to have the 53ESS approved as a modular device in accordance with FCC public notice DA-00-1407. The checklist below demonstrates compliance to the requirements for modular approvals as specified in the public notice:

Does the modular device have its own shielding?

Yes. Shielding is not required. The device passes all emissions requirements with no shielding.

Does the modular transmitter have buffered modulation/data inputs (if such inputs are provided) to ensure that the module will comply with Part 15 requirements under conditions of excessive data rates or over-modulation?

Does the modular transmitter have its own power supply regulation? Yes.

Is the antenna either permanently attached or employ a "unique" antenna coupler (at all connections between the module and the antenna, including the cable)?

The antenna is a special made antenna that snaps onto the front face of the meter. The antenna connection mechanism is unique to this product.

Was the modular transmitter tested in a stand-alone configuration?

Yes. The board was tested in a stand alone configuration. The only additional fixturing that was needed was a plastic housing used to hold the antenna in place. The plastic housing had a negligible effect on the signal.

Sincerely,

Drew Rosenberg Regulatory Engineer Itron, Inc. 2401 North State Street Waseca, MN 56093 Phone: (507)-837-5264

