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15 May 2020

Subject: Professional Installation
FCC ID: E09CCU100C; IC:864A-CCU100C

To whom it may concern.

The following items justify professional installation in order to support any function that requires the use of the device's part 15 transmitter:

The device cannot be sold retail to the general public or by mail order. It must be sold to dealers.

The equipment is not readily available for consumer use; the equipment is marketed to a highly specialized target group through focused marketing channels. Only public or private utilities will purchase this device.

Distribution of the product is controlled

Distribution is controlled specifically through Itron's distribution channels.

Enabling functionality at installation must be controlled.

The end user will have to go through proper training in order to enable functions such as the antennas and transmitters.

What is unique about the product which would lend itself to needing to be professionally installed?

The equipment must be installed on a utility pole, communications towers, water towers or buildings by individuals licensed and trained for this type of installation. Proper installation is extremely important for meeting system performance criteria.

Installed by licensed professionals requires special training

Itron will provide training in order to fulfill this "licensing" requirement. As part of this training, installers will be instructed to only use the antenna model that is provided with the device. Training will also be provided to teach the end user how to enable any features that require part 15 transmitter operation.

The intended use is generally not for the general public. It is generally only for industry/commercial use.

This device is used to communicate with utility meters. Only utility employees will use this device.

Sincerely,

Jay R. Holcomb
Spectrum Regulatory
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Itron, Inc.

Enclosure: n/a
CC: n/a