



February 3, 2023

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

To whom it may concern:

Itron, Inc. hereby requests a Permissive Change Class II of the radio equipment certification for the product name certification number, FCC ID: EO9DCU53104C. This product differs from the originally approved product in the following manner:

(a) Associated digital circuitry –

- i. Dual Carrier board:
 1. USB Hub manufacturer part number change; same part with same form, fit, and function from same manufacturer.
 2. Replaced obsolete 6.0 MHz crystal for USB hub with a new crystal having same specifications from same manufacturer. Same form and function; minor pad size changes required board layout change.
- ii. Power/USB board:
 1. USB Hub manufacturer part number change; same part with same form, fit, and function from same manufacturer.
 2. Replaced obsolete 6.0 MHz crystal for USB hub with a new crystal having same specifications from same manufacturer. Same form and function; minor pad size changes required board layout change.
 3. Replaced obsolete LED with new part. Same form and function; minor pad size changes required board layout change.
 4. Replaced obsolete Current Gauge chip used for GPS receiver antenna sensing. Changed from a single-chip Current Gauge to a discrete component antenna open/short detection circuit recommended by the GPS module manufacturer (added five transistors plus biasing). Required layout changes. This circuit only senses the state of the GPS antenna; it is not part of the GPS RF circuit path.
- iii. (this item intentionally blank)



iv. 915 MHz Radio board:

1. Processor module manufacturer part number change. The new part is a drop-in replacement for the current part with the same form, fit, and function from same manufacturer. There is no change to the radio RF circuit.
- (b) Functional capabilities – There are no changes to functional capability.
(c) Antenna Characteristics – There are no changes to antenna characteristics.
(d) Cosmetic differences – There are no changes to the cosmetic appearance of the product.
(e) Other(?) – There are no other changes.

I do attest that the Field strength and/or RF Output readings remained the same or are lower than the originally approved product and that they did not increase, therefore qualifying this product for this application type.

Sincerely,

A handwritten signature in black ink that reads "Jack McPeck". The signature is written in a cursive, flowing style.

Jack McPeck
Sr. Product Development Manager
Itron, Inc.