

Hunter, Jessina

From: Karen Rackley [Karen.Rackley@fcc.gov]
Sent: Friday, October 08, 2004 7:52 AM
To: Rosenberg, Drew
Cc: Rashmi Doshi; LabHelp
Subject: RE: FC200 vs G5R

Drew,

On September 23, 2002 Itron was issued a waiver of Section 15.231(e) to allow its utility meter programmer to operate with a transmission time of 1.5 seconds instead of 1 second as required by the rule. This waiver was not restricted to any specific Itron model of utility meter programmer. You state that Itron now has a new model of utility meter programmer that uses the same radio as the model that was certified under the 2002 waiver. Therefore, the 2002 waiver, and its conditions, would apply to the newer model of Itron utility meter programmer. No, new waiver is necessary for this device to obtain equipment authorization.

Regards,

Karen Rackley

-----Original Message-----

From: Rosenberg, Drew [mailto:Drew.Rosenberg@itron.com]
Sent: Thursday, October 07, 2004 5:44 PM
To: Karen Rackley
Subject: FC200 vs G5R

Hello Karen,

As per our conversation earlier today, I am sending you this email to describe the difference between the G5R, which received the most recent waiver, and the FC200 handheld, which is currently under evaluation. Both devices contain what the Itron engineering department refers to as the "Raptor" radio. The transmitter circuitry in both of these devices is the same.

Differences:

We do not believe that a class 2 permissive change was justified because while the transmitter circuit is the same, the G5R radio was not approved as a module. The G5R is a handheld device that runs on an embedded DOS operating system and contains the Raptor radio. The FC200 runs on a Windows CE platform, but also contains the raptor radio.

The Same Transmitter:

Although the G5R and FC200 are very different from each other, their radios are the same. As a result, the FC200 is limited to the same constraints from an RF perspective as the G5R. Due to the fact that the same transmitter circuitry exists in both models, we request that the G5R waiver be applied to the FC200.

Regards,

Drew Rosenberg
Regulatory Engineer
Itron, Inc.
2401 North State Street
PO Box 1735
Waseca, MN 56093
Tel 507-837-5264
Fax 507-837-5200

drew.rosenberg@itron.com

