



July 28, 2004

Subject: Request for confidentiality
FCC ID: EO9-SPIRIT
IC ID: 864D-SPIRIT (if ever approved for Canada)

Dear Sir or Madam:

Please respect the confidentiality of the following items and withhold them from the public in accordance with 47CFR.457, 47CFR.459, and RSP-100 sec.10:

Any schematic, block diagram, theory of operations, or picture of the inside of the product that is submitted by Itron to any regulatory authority including but not limited to the FCC, Industry Canada, or a TCB, should be regarded as "Trade Secrets" as specified by 47CFR.457(d). Such material should not be disclosed to the public or anyone other than Itron.

Internal pictures have been included because this is not a consumer device and cannot be easily accessed by the consumer. The device is sealed in a meter box at the time of installation. The FCC has previously found these reasons to be acceptable for other Itron products such as the 51ESS, which has an FCC ID of EO9-51ESS.

If you have any questions, then please feel free to contact me at 507-837-5264. I can also be reached by email at drew.rosenberg@itron.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Drew Rosenberg", is written over a thin horizontal line.

Drew Rosenberg
Regulatory Engineer
Itron, Inc.
2401 North State Street
Waseca, MN 56093
Phone: (507)-837-5264
Fax: (507)-837-5200
Drew.rosenberg@itron.com