



Elliott Laboratories Inc.
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December 6, 1999

Chief, Equipment Authorization Branch,
Authorization and Evaluation Division,
Office of Engineering and Technology
FEDERAL COMMUNICATIONS COMMISSION
P.O. Box 358315
Pittsburgh, PA 15251-5315

Gentlemen:

The enclosed documents constitute a formal submittal and application for a Grant of Equipment Authorization pursuant to Subpart C of Part 15 of FCC Rules (CFR 47) regarding intentional radiators. Data within this report demonstrates that the equipment tested complies with the FCC limits for intentional radiators.

Elliott Laboratories, as duly authorized agent prepared this submittal. A copy of the letter of our appointment as agent is enclosed.

If there are any questions or if further information is needed, please contact Elliott Laboratories for assistance.

Sincerely,

Mark R. Briggs
Manager, EMC Consulting Services

MRB/dmg
Enclosures: Agent Authorization Letter
Emissions Test Report with Exhibits

Badger Meter, Inc.

4545 W. Brown Deer Road, P.O. Box 23099
Milwaukee, WI 53223-0099 (414) 355-0400

Deirdre C. Elliott
Vice President
Corporate Legal Counsel and Secretary



December 14, 1999

Federal Communications Commission
7435 Oakland Mill Road
Columbia, MD 21046

Gentlemen:

This is your letter of authorization to accept our appointment of Elliott Laboratories, Inc., as Agent for Badger Meter, Inc., 4545 W. Brown Deer Road, P. O. Box 245036, Milwaukee, WI 53224-9536, solely in connection with the submittal of the application for approval of FCC ID No. GIF4545, to sign applications before the Commission and to make representations to you on our behalf. Elliott Laboratories is to receive and exchange data between our company and the Commission. This authorization is made pursuant to Section 2.911(c) of the FCC Rules and expires on June 30, 2000.

I hereby certify on behalf of Badger Meter, Inc., 4545 W. Brown Deer Road, P. O. Box 245036, Milwaukee, WI 53224-9536 ("Applicant"), that neither Applicant nor any party to the application (officers, directors, and 5% shareholders) is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. 21 U.S.C. 853a.

Sincerely,

BADGER METER, INC.



Deirdre C. Elliott
Vice President
Corporate Legal Counsel and Secretary

Badger Meter, Inc.

4545 W. Brown Deer Road, P.O. Box 23099
Milwaukee, WI 53223-0099 (414) 355-0400

Deirdre C. Elliott
Vice President
Corporate Legal Counsel and Secretary



December 14, 1999

Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Dear Examiner:

I am writing to avoid the possibility of an inadvertent disclosure of proprietary information.

The accompanying Form 731 is being filed with the Commission on our behalf by Elliott Laboratories, Inc., a consulting and testing laboratory. Included as exhibits with the enclosed application are block diagrams, schematics, processing gain, and a detailed description of the theory of operation of the device.

It is our intention to provide the Commission with a full disclosure of our product so that its merit can be evaluated. Indeed, we are pleased to provide any further information that the Commission might wish to see. It is not our intention, however, to make our proprietary process a matter of public record.

In view of the fact that the block diagrams, schematics, processing gain, and associated theory of operation disclose the mechanism of our process, we ask that these portions (block diagrams, schematics, processing gain, and theory of operation) of our application be withheld from public inspection as provided under FCC Section 0.459. These documents contain details of the proprietary operation of product. These details are not readily discernible - even to technically sophisticated individuals - from our hardware and constitute trade secrets.

We request therefore that these documents and this letter be segregated from the body of our evaluation report and withheld from public inspection.

Thank you for your attention to this request. Please let the undersigned know if the Commission disagrees with our position or requires further justification.

Sincerely,

BADGER METER, INC.



Deirdre C. Elliott
Vice President
Corporate Legal Counsel and Secretary

Enclosures