



Federal Communications Commission
Authorization and Evaluation Division

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Subject: Confidentiality Request for FCC ID: QZC-EA2G-I

www.elster.com

Pursuant to FCC 47 CRF 0.457(d) and 0.459 and IC RSP-100, Section 10, the applicant requests that a part of the subject FCC/IC application be held confidential.

Type of Confidentiality Requested		Exhibit
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Block Diagrams
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	Internal Photos
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Operation Description/Theory of Operation
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Schematics

Elster Solutions has spent substantial effort in developing this product and it is one of the first of its kind in industry. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will result in financial hardship.

Elster Solutions requests permanent confidentiality for the block diagram because it describes in detail how we chose to distribute system gain and where we locate filtering, both of which are important keys to how we achieve our system performance. Making this information available to our competition would unfairly undermine any competitive advantage we may have. Elster Solutions also requests permanent confidentiality for our schematics since they obviously contain very detailed, intellectual property. Finally, Elster Solutions requests permanent confidentiality for the Operation Description because it contains such sensitive information as our pseudorandom hopping sequence, channel selection and network architecture which is proprietary.

Elster Solutions requests the exhibits selected above as short term confidential be withheld from public view for a period of 180 days from the date of the Grant of Equipment Authorization and prior to marketing. This is to avoid premature release of sensitive information prior to marketing or release of the product to the public.

Respectfully,

John Holt
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