

Federal Communications Commission

Authorization and Evaluation Division

Re: FCC ID: QZC-ILC24-I

January 28, 2010

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The purpose of this letter is to request limited modular approval of the Elster Solutions Energy Axis Internal LAN Controller 2, Model ILC24-I, printed circuit board assembly, which operates as a frequency-hopping spread-spectrum transceiver for automatic meter reading in the 902-928 MHz ISM band under the provisions of FCC Part 15.247. The ILC24-I is designed to be an option board for Elster Solutions Alpha A3 electricity meters.

To address the specific numbered items of Public Notice DA 00-1407:

- 1. The ILC24-I board incorporates two shields, one over the wireless transceiver IC and one over the RF power amplifier, both attached (soldered) to the printed-circuit board. The bottoms of the shields are enclosed by a copper plane that is part of the printed-circuit board.
- 2. The ILC24-I transmitter incorporates digital buffers on the data inputs, which are part of the transceiver IC. The peak modulation is set by the firmware that is stored within the transceiver IC. The data rate is set by the same stored firmware. For this reason, over-driving the modulation input, or applying excessive data rates to the data input cannot produce over-modulation.
- 3. The ILC24-I has its own power supply regulation. It receives unregulated power from the host metering device and this is applied to a switching regulator which is followed by a linear regulator to supply the lower voltage sections of the device. For this reason, varying the supply voltage to the ILC24-I cannot vary the transmitter power, which is set and measured at the time of manufacture.
- 4. Antennas. The ILC24-I can be constructed to operate with either an internal or an external antenna. The internal antenna supplied with the ILC24-I is designed to conform to the round exterior of the electricity meter. The antenna resides under the exterior meter cover that is secured to the meter socket enclosure and secured with the electric utility's anti-tamper seal. For installations requiring an external antenna, Elster Solutions has approved three antennas as described in the installation leaflet provided to Elster customers and detailed in the TCB submittal.
- 5. The ILC24-I module is intended to be installed in A3 ALPHA electricity meters and metering equipment supplied by Elster Solutions. The module has been tested in representative configurations.
- 6. The ILC24-I has a label to identify the module's FCC ID. This label is silkscreen printed on the ILC24-I printed circuit board assembly and is thus permanent. Additionally, the FCC ID appears on the front-panel nameplate of Elster Solutions meters and devices that contain the ILC24-I module.



- 7. The ILC24-I complies and is certified for compliance with all of the applicable provisions of FCC Part 15.247 for frequency-hopping spread-spectrum devices.
- 8. The ILC24-I is a low-power (204 mW) device and operates with a low duty cycle. The ILC24-I has been demonstrated and certified to comply with the MPE RF exposure requirements for mobile devices. Installation and operating instructions specify the required minimum distance from humans for installed electricity meters

Respectfully,

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