

October 24, 2008

Federal Communications Commission Authorization and Evaluation Division

Confidentiality Request regarding Class II Permissive Change for FCC ID QZC-ILC2I

To Whom It May Concern:

Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, we hereby request confidential treatment of information accompanying this application as outlined below:

- Electrical schematic diagram
- Technical Description of the product changes and product operation
- Internal Photos

The type of information listed above is not normally made available to our customers, competitors or to the public. Public disclosure of this information could unjustly be used by our competitors to learn schemes and techniques that are intellectual property of Elster Electricity, LLC.

The device is used in electricity meters which are non-consumer devices, only serviceable by the licensee or by designated electric utility technicians. Electricity meters are also sealed by the utility to prevent unauthorized access by the consumer.

The applicant understands that pursuant to Section 0.457 of the rules, disclosure of this application and all accompanying documentation will not be made before the date of the Grant for this application.

Thank you for your cooperation.

Respectfully,

John Holt

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