



## Federal Communications Commission

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The purpose of this letter is to request limited modular approval of the Elster Electricity LLC, Energy Axis Internal LAN Controller 2, Model ILC2I, 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 ILC2I is designed to be an option board for Elster Electricity, LLC. Alpha A3 electricity meters.

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

1. The ILC2I 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 ILC2I transmitter incorporates digital buffers on the data inputs, which are part of the transceiver IC. The peak modulation is set by the program that is stored within the transceiver IC. The data rate is set by the same stored program. For this reason, over-driving the modulation input, or applying excessive data rates to the data input cannot produce over-modulation.
3. The ILC2I has its own power supply regulation. It receives unregulated power from the metering devices 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 ILC2I cannot vary the transmitter power, which is set and measured at the time of manufacture.
4. Antennas. The ILC2I can be constructed to operate with either an internal or an external antenna. The internal antenna supplied with the ILC2I 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 Electricity LLC has approved four antennas as described in the installation leaflet provided to Elster customers and detailed in the TCB submittal.
5. The ILC2I module is intended to be installed in A3 ALPHA electricity meters and metering equipment supplied by Elster Electricity LLC. The module has been tested in representative configurations.
6. The ILC2I has a label to identify the module's FCC ID. This label is silkscreen printed on the ILC2I printed circuit board assembly and is thus permanent. Additionally, the FCC ID appears on the front-panel nameplate of Elster Electricity LLC meters and devices that contain the ILC2I module.



7. The ILC2I 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 ILC2I is a low-power (144 mW) device and operates with a low duty cycle. The ILC2I 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,

A handwritten signature in black ink that reads "John Holt". The signature is written in a cursive, flowing style.

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