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Federal Communications Commission
And Industry Canada

Pursuant to the provisions of Sections 0.457(d) and 0.459 of the Commission's Rules and Section 552(b)(4) of the Freedom of Information Act, Elster Electricity, LLC requests that the following documents be treated as confidential:

- Electrical Schematic Diagram
- Description of the product and it's operation
- Functional block diagram
- All assembly drawings

We are requesting that the material be treated as confidential because publication of these materials would enable competitors to do cost estimates of our products to their advantage and to learn details of the operation of the meter and its control algorithms that we would normally treat as company confidential information and it would not be made available to our customers, competitors or the public. Availability of this level of detail of our products to our competitors could place us at a considerable disadvantage in a very competitive marketplace.

Thank you for your cooperation.

Respectfully,

Charles Cunningham, Jr.
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