Electric / Gas / Water Information collection, analysis and application

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Federal Communications Commission P.O. Box 429 Columbia, MD 21045 Date: June 17, 2013

RE: Application for Limited Modular Approval Certification for the ITR24 register module

Dear Sir or Madam:

The following information addresses the requirements to support a limited modular approval as required by FCC Part 15.212, Modular Transmitters.

- 1. The direct sequence spread spectrum transmitter section is not shielded. Testing has been performed to assure compliance.
- 2. The ITR24 does not have external modulation or data inputs. The RF section is driven by an on board MCU which controls RF data lines and does not allow excessive modulation.
- 3. The modular transmitter has its own power regulation. The module will be integrated into a meter host which also offers power regulation.
- 4. The direct sequence and frequency hopping transmitters have antennas that are permanently imbedded into the module circuit board.
- 5. The ITR24 module was tested within a host meter. This module will always be integrated internal to a meter host.
- 6. The ITR24 register module will be labeled as required. The meter host will also have the required labeling.
- 7. Operating requirements are included in the host technical manual.
- 8. MPE measurements are provided to demonstrate RF compliance. There is a cautionary statement that is included in the technical manual stipulating the 20 cm separation distance.

All meter forms which act as hosts to the ITR24 module will be tested with the ITR24 module for compliance and documented through the permissive change process.

Sincerely,

Name: Lee Littlejohn Signature: Chi Abure Date: June 17, 2013

