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FCC Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

8 October 2003

Attention: Application Examiner
 Reviewing Engineer

Re: Request for confidentiality per Section 0.459 of FCC Rules
Applicant: Invensys Metering Systems
FCC ID: KCH-XEMICS-BAT

To whom it may concern,

Request is hereby submitted, on behalf of my client, Invensys Metering Systems, to withhold from public review certain portions of the application for equipment certification for the referenced FCC identifier. In particular, the following sections of the application and report are requested to be kept confidential:

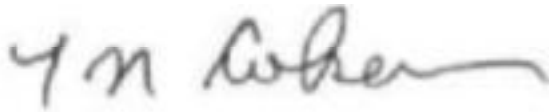
Schematics
Block Diagram
Theory of Operations
User manual

Rationale for request for confidentiality:

Invensys has invested considerable time and materials in research and development to produce the referenced product. Disclosure of the confidential portions of this application to competitors would give them competitive advantage in developing similar products.

If you have questions or need further information, please contact the undersigned.

Sincerely,



THOMAS N. COKENIAS

EMC Consultant/Agent for Invensys