



**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 Model REX2EAI 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.

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

1. The REX2EAI board incorporates two shields, over both the wireless transceiver and the RF power amplifier that are 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 REX2EAI 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 REX2EAI 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 REX2EAI cannot vary the transmitter power, which is set and measured at the time of manufacture.
4. Antennas. The internal antenna supplied with the REX2EAI is fully integrated into the printed circuit board, being constructed of copper patterns etched in the board during its fabrication.
5. The REX2EAI board is intended to be installed only in Rex2 electricity meters and metering equipment supplied by Elster Electricity LLC. The module has been tested in representative configurations.
6. The REX2EAI has a label to identify the module's FCC ID. This label is permanently affixed to the REX2EAI printed circuit board assembly. Additionally, the FCC ID appears on the front-panel nameplate of Elster Electricity LLC meters and devices that contain the REX2EAI.



7. The REX2EAI 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 REX2EAI is a low-power (220 mW) device and operates with a low duty cycle. The REX2EAI 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".

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