

GEHMAN LAW PLLC

March 10, 2015

Via U.S. Mail and Electronic Comment Filing System

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Notice of ex parte presentation in RM-11738

Dear Ms. Dortch:

On March 9, 2015, George Uram, Executive Vice President of Sensus USA Inc. (“Sensus”), Stan Woodcock, Sensus Spectrum Manager, and myself as counsel to Sensus, met with Renee Gregory of the Chairman’s Office. Subsequently, on March 9, 2015, George Uram, Stan Woodcock and I met with Brian Regen, Sean Conway, Roger Noel, Scot Stone, Melvin Spann and Wayne Leighton of the Wireless Telecommunications Bureau.

In these meetings, we discussed Sensus’ comments and reply comments in the above referenced proceeding responsive to the Petition for Rulemaking of The Enterprise Wireless Alliance and Pacific DataVision (“PDV Petition”). Sensus noted that there are approximately 700 users located in 48 states of the US communicating with 15 million devices using Sensus designed “FlexNet” systems operating on narrowband PCS channels. Sensus reiterated that it is opposed to the PDV Petition until such time as agreed-to technical and non-technical protections are put in place to prevent interference with systems operating in Narrowband PCS channels. Sensus and a number of Sensus system users hold FCC licenses for NPCC channels N1, N2, N3, N4 and N5 (partitioned), which are immediately adjacent to spectrum proposed by the PDV Petition to be reallocated to LTE.

Sensus noted that devices such as the LTE devices proposed by the PDV Petition emit high levels of wide band noise that could reduce service levels and impose significant additional costs for present users. Sensus estimates that a 10 dB increase in the NPCC noise floor would require deployed FlexNet systems to approximately quadruple the number of base stations to provide the same level of service. Sensus noted that it is working with Pacific DataVision to define a technical solution but the parties are a long way away from reaching any agreement.

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Sensus discussed that its customers are critical infrastructure providers, namely utilities and municipalities distributing electricity, natural gas and water for residential and commercial use.

Sensus also discussed that its FlexNet system system users are making use of additional capability beyond meter reading including using the system for demand response, distribution system monitoring, distribution automation, street lighting control, and that even for customers choosing to use FlexNet initially to read meters, FlexNet provides an easy pathway to incrementally add such functions

Finally, Sensus discussed that it designs sensitive receivers to take advantage of the low noise floor in order to provide cost effective solutions to utilities and municipalities and that in the approximately 13 years that it has been deploying FlexNet, Sensus has not observed any significant adverse system impact due to adjacent narrowband systems increasing the noise floor.

A copy of this letter is being filed electronically for inclusion in the public record of this proceeding and is being transmitted electronically to each of the persons listed below. Please contact me should you have any questions or require further information.

Very truly yours



Julian P. Gehman

cc: Renee Gregory
Brian Regen
Sean Conway
Roger Noel
Scot Stone
Melvin Spann
Wayne Leighton