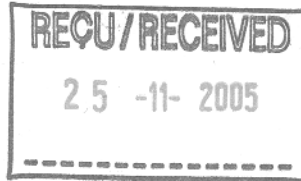


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**BY COURIER**

Dr. Robert McCaughern  
Director General  
Spectrum Engineering Branch  
Industry Canada  
300 Slater Street  
Ottawa, Ontario  
K1A 0C8



November 28, 2005

Dear Mr. McCaughern:

**RE: Gazette Notice SMSE -005-05  
Consultation Paper on Broadband over Power line (BPL) Communication  
Systems**

I am writing on behalf of Itron, Inc. ("Itron") a leading energy services provider and manufacturer of automated meter reading ("AMR") technology. Based in Spokane, Washington, USA, Itron provides a range of energy management products and services to utilities around the world. A number of leading electric, gas, and water utilities in Canada have made use of Itron products for many years in order to manage consumption readings, their billings, and customer information services.

AMR allows utilities to collect consumption information more efficiently which leads to greater data reliability and billing accuracy. Customer service is improved (estimated readings are avoided), and with the greater efficiencies introduced, utilities can realize significant operational savings. Once AMR technologies are installed, the foundation is laid for the delivery of advanced meter data collection which, over time, can reduce overall energy consumption. Since advanced AMR can make possible time of use billing, innovative rate structures for electricity can be introduced to allow for new tariffs based on critical peak pricing. As demand shifts to take advantage of lower prices at certain times of day, power generation assets can eventually be rationalized and reduced. Advanced AMR technologies also permit utilities to read meters on demand, to account for the arrivals and departures of residents, and to detect power outages as well as the restoration of power. With these advanced tools in place, customers are treated more efficiently and more fairly, as well as encouraged to use power more economically.

In North America, the use of AMR technologies is steadily gaining ground, if not perhaps with the same speed that many thought might happen 8 or 10 years ago when deregulation at the retail level was seen as just around the corner. A variety of technologies are currently being used: wireless using licensed and unlicensed bands, narrowband powerline carrier, and others including conventional wireline and cellular telephone networks. The wireless technologies are by far the most prevalent (some 60 million of 280 million meters in the U.S.) but narrowband powerline is also extensively used (10 million out of 280 million). Itron is the world's leading manufacturer of wireless AMR technologies using a variety of graduated technologies from hand-held readers, to mobile van readers to sophisticated fixed networks that are capable of advanced meter data collection.

Itron was instrumental in the spectrum policy proceeding in 1999 that opened the 1.4 GHz band in Canada to AMR and other narrowband technology applications. Wireless technologies are evolving at a relentless rate with greater bandwidth and throughput, both for mobile and fixed services. As an advisor and supplier to gas, electric and water utilities, Itron is cognizant of the need for utilities to have a variety of technologies available, to serve both urban and rural communities, residential and commercial markets, as well as other special, hard-to-serve situations. What is important for utilities is that the technologies chosen be stable, secure, scalable, have adequate bandwidth and coverage and, of course, be affordable. Utilities have historically not invested to be adopted large sums on meter reading and data gathering equipment, and new technologies must generate savings commensurate with their cost.

With the above background information in mind, Itron wishes to make some general comments about the introduction of BPL in Canada. Itron views BPL as a very promising technology, among others, to help bring the benefits of AMR to more and more consumers. The synergies between AMR and BPL, both operating on or in conjunction with the power grid, would appear obvious. However, BPL is still to a large extent in the experimental stage, and its usefulness to AMR as a transmission path has yet to be conclusively demonstrated. Still, from the trials conducted to date, BPL technologies hold considerable promise for a variety of internal utility applications such as capacitor bank control, security monitoring as well as AMR.

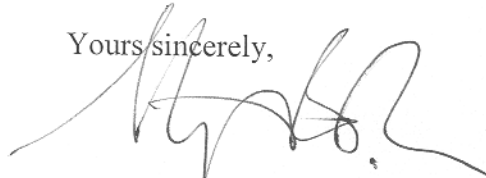
Clearly BPL should be subject to appropriate and defensible emission controls that protect users of the RF spectrum from unacceptable interference. Itron also recognizes that the HF band is still of great importance for a number of public safety agencies, and accepts that BPL operations should be prohibited from using the specific frequencies employed by these agencies.

BPL is an interesting new technology with many potentially useful applications in the energy management field. While certain restrictions are needed to protect other users of the 1.7 to 80 MHz band, these restrictions should be kept to a minimum so as not to hobble a promising technology in its infancy. In framing its regulatory approach to BPL, Industry Canada should keep in mind that the window of opportunity for this new technology is probably

relatively short. The necessary regulatory instruments should therefore be put in place with all due speed.

Thank you for the opportunity to comment on an issue of great interest to Itron and the AMR field in general.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. B. Acker', written in a cursive style.

Stephen B. Acker

jf/SBA

cc: Arun Sehgal, Itron, Inc.  
Jay Holcomb, Itron, Inc.