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Pamela Miller  
Director General  
Telecommunications Policy Branch  
Industry Canada  
300 Slater Street  
Ottawa, Ontario K1A 0C8

Dear Ms. Miller:

**Re: Canada Gazette Part I, December 19, 2009  
Notice No. DGTP-010-09 Consultation on the Spectrum Allocations and  
Spectrum Utilization Policies for the Frequency Range 1435 – 1525 (L-Band)**

The following comments on the above-referenced Gazette Notice and L-Band consultation paper (the “Consultation”) are submitted on behalf of Itron Inc. (“Itron”).

Headquartered in Spokane, WA, with offices in many other countries, Itron is a leading technology provider to the global energy and water industries. It is the world’s leading provider of intelligent metering, data collection and utility software solutions, with nearly 8,000 utilities worldwide using its technology to optimize the delivery and use of energy and water. Its products include electricity, gas, water and heat meters, data collection and communication systems, including automated meter reading (AMR) and advanced metering infrastructure (AMI), meter data management and related software applications, as well as project management, installation, and consulting services. Itron has been active in Canada for at least 20 years and its metering products are used by a number of leading Canadian electrical, gas and water utilities.

The Consultation states in section 3.3.2 that “In 1999, the Department designated the band 1493.5 – 1496.5 MHz among others, for narrowband multipoint communications systems (N-MCS) for AMR use for public utility telemetry in urban areas.” As the Department is aware, together with its Canadian partner at the time, Enlogix, Itron was prominently involved in discussions with the Department and in the RABC, leading up to that designation. Itron also participated in the subsequent consultation in 2005 that considered changes to the lower N-MCS/AMR designation at 1427-1430 MHz as well as to the upper designation at 1493.5 – 1496.5. As the Department points out in section 3.2.2, no interest was shown at the time by the utility sector, or by others, in an expansion of the 1493.5 – 1496.5 band to support utility telemetry applications. On the other hand, Itron did advocate strongly in that consultation for a utility telemetry band plan in Canada that would be harmonized with the U.S. band plan. In short, the band 1429.5 to 1432 MHz should be designated for use by utility telemetry, including the increasingly sophisticated AMR applications, the demand for which was being driven by the push throughout North America for smart metering. Within Canada, the Province of Ontario has been particularly active in promoting the adoption of smart metering by the Province’s electric and other utilities.

Despite the recent financial uncertainties, Itron believes strongly in the future of AMI smart metering technologies. It has invested aggressively through acquisitions and internal growth in developing state-of-the-art equipment and software systems to service this growing market, and to remain competitive in a field that has become hotly competitive. While Itron and its competitors develop and use equipment in a number of different frequency bands, the 1429.5 – 1432 MHz band has been, and remains an important one for Itron. Itron has developed an advanced two-way smart meter technology for water meters called WaterSave Source that operates in this band. This technology is among the most advanced on the market and several municipalities in Canada are looking at it as a possible solution to making their water supply more efficient in operation and in water conservation. The Consultation assumes that the N-MCS (or AMR) designation in this 2.5 MHz band will remain unchanged, and Itron would certainly support its retention as a key band for AMR and AMI applications.

The Consultation notes that the paired SRS channel 1493.5 – 1496.5 MHz was also designated for N-MCS or AMR use in urban areas in 1999. Itron has not made use of that band and has no plans to use it in future. Unlike the 1429-1432 MHz band, it is not a band that is in common use in other markets around the world. Accordingly, Itron has no objection to the Department’s proposal to rescind the designation for N-MCS or AMR use in the band 1493.5 – 1496.5 to make way for a proposed new designation for aeronautical mobile telemetry in the wider band of 1492 – 1525 MHz.

We thank the Department for this opportunity to comment on proposed spectrum policy changes of great interest to Itron and the wider AMR/AMI industry.

Yours sincerely,



Stephen B. Acker

cc: Jay Holcomb  
S. Destito