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16 August 2023

Federal Communications Commission:

Responding to Form 442, Question 7:

a. The complete program of research and experimentation proposed including description of equipment and theory of operation.

Aclara sells communications equipment in the utility industry. We are evaluating system capabilities in a real-world environment as Aclara adds additional functionality to the next generation systems including the use of 450MHz and 900MHz spectrum. The system consists of head-end software residing either in the cloud or on premises at the utility, base stations that cover several square miles and end point NICs that integrate into utility equipment. The link between the base stations and the NICs are the radio link that we are utilizing 450MHz and 900MHz spectrum to communicate between the devices.

b. The specific objectives sought to be accomplished.

The objective is to use this license for research and product development testing in a real-world environment resulting in a final commercial product.

c. How the program of experimentation has a reasonable promise of contribution to the development, extension, expansion or utilization of the radio art, or is along line not already investigated.

The goal is to test and evaluate the next generation system that can apply enhancements in the AMI and grid automation use cases in the utility industry.

Respectfully,

James Midyette, P.E.