

EXHIBIT XIII - Cover Letters

New Certification Report for the
FCC ID: KBCIX260-PRO750BT

- Cover Letter 1.) Certification Action Requested
- Cover Letter 2.) Request for Confidentiality under Part 0.459.
- Cover Letter 3.) ITRONIX Agent Authorization letter allowing Rod Munro to sign FCC Form 731 on behalf of ITRONIX, Corp.



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Edmonds, WA 98020-3581

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September 14, 2004

Federal Communications Commission
Authorization and Evaluation Division
C/O American TCB, Inc.
7435 Oakland Mills Road
Columbia, MD 21046

Re: Action Requested - Certification under Parts 24E & 15.247 of three physically co-located
mobile transmitters.
FCC ID: KBCIX260-PRO750BT
Grantee: ITRONIX, Corporation

Gentlemen:

On behalf of ITRONIX, Corporation we request Certification for the above referenced device which contains three internally integrated co-located mobile transmitters. The manufacturer includes instructions in the user manual and also in a sheet with each device instructing the user to maintain a minimum of 20 cm or greater spacing between of the IX260 antenna and the user. The IX260 is a ruggedized laptop PC which contains the following:

- 1) WAN, GSM, GPRS, OEM radio modem certified by Sierra Wireless, Model: AirCard 750 under the FCC ID: N7NAC750 and again in the IX260 by ITRONIX Corp. recently under the FCC ID: KBCIX260A750MPIBT.
- 2.) WLAN 802.11(b) & (g) Mini PCI type, previously Certified Intentional Radiator by Intel, Corp., and Model: WM3B2200BG, FCC ID: PD9WM3B2200BG under Part 15.247 for DTS devices.
- 3.) Bluetooth Intentional Radiator previously Certified by OEM Mitsumi, FCC ID: POOWML-C11XX, and by ITRONIX in the IX260 under the FCC ID: KBCIX260A750MPIABT under Part 15.247 rules for FHSS.

The WAN and WLAN do not transmit simultaneously. However, either WAN or WLAN can transmit simultaneously with the Bluetooth Intentional Radiator.

For Item 1, above, EMC test reports prepared by Celltech Labs covering radiated spurious and harmonic emissions are submitted supporting Certification under Parts 24E. The test reports submitted were prepared originally for the FCC ID: KBCIX260A750MPIBT. The OEM device was originally approved by Sierra Wireless under the FCC ID: N7NAC750. The newly identified device is physically and electrically the same as the original device with the exception of a new Intel PRO WLAN. The Bluetooth Intentional radiator remains unchanged in this configuration.

For Item 2, the new INTEL PRO, WLAN module we submit a supplemental EMC test report covering radiated spurious and harmonic emissions for this Intentional Radiator and its only antenna under Part 15 prepared by Spectrum Technology, Inc. The INTEL test report prepared

by AEGIS Labs is also submitted in support of this application for the OEM, Model: WM3B2200BG, FCC ID: PD9WM3B2200BG.

For Item 3, the Bluetooth device, we submit complete EMC measurement data previously used in support of Certification for the FCC ID: KBCIX260MPIA750BT. We will be referring to this original ITRONIX Certification data in its entirety for the Bluetooth test data. We believe this test data remains representative of the newly identified device.

Simultaneous transmit data is submitted for the two Part 15.247 Intentional Radiators as they can transmit simultaneously.

MPE calculations are submitted for the combined transmitter combinations, 1.) WAN and Bluetooth, 2.) WLAN and Bluetooth, and 3.) MAX-RAD, vehicular antenna.

The three above referenced OEM transmitter modules as used by ITRONIX, Corp. would be considered "identical" to the originally approved OEM devices as defined by Part 2.908.

Please contact the undersigned should you require any additional information concerning this application for Certification. We sincerely thank you for your time and consideration of this application.

Sincerely,



Rod Munro

President
Spectrum Technology, Inc.

Agent on behalf of ITRONIX, Corp.

Email: rmunro@spectrumti.com



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September 10, 2004

American Telecommunications Certification Body
6731 Whittier Ave
Suite C110
McLean, VA 22101

RE: ITRONIX CORPORATION
FCC ID: KBCIX260-PRO750BT
Request for Confidentiality

Gentlemen:

In accordance with 0.459 of CFR 47, ITRONIX CORPORATION hereby requests confidentiality of the, (Block Diagrams, Schematics, Parts List, Tune Up Procedure, Operational Description) attachments for the subject application.

These documents contain detailed system and equipment description and related information about the product which ITRONIX CORPORATION considers to be proprietary, confidential, and a custom design and, otherwise, would not release to the general public. Since this design is a basis from which future technological products will evolve, ITRONIX CORPORATION considers that this information would be of benefit to its competitors, and that the disclosure of the information in these documents would give competitors an unfair advantage in the market.

Sincerely,

Richard G. Sargent
Sr. Services Manager, Engineering
ITRONIX CORPORATION



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August 17, 2004

American Telecommunications Certification Body, Inc.
6731 Whittier Avenue
Suite C110
McLean, VA 22101

To Whom It May Concern:

Please be advised that Itronix Corporation authorizes Rod Munro of Spectrum Technology Corporation to act on our behalf, until otherwise notified, for applications submitted to American Telecommunications Certification Body, Inc. (ATCB).

We certify that we are not subject to denial of federal benefits, that includes FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse ACT of 1988, U.S.C. 862. Further, no party, as defined in 47 CFR 1.2002(b), to the application is subject to denial of federal benefits, that includes FCC benefits.

Thank you for your attention to this matter.

Richard Sargent
Engineering Manager
ITRONIX CORPORATION