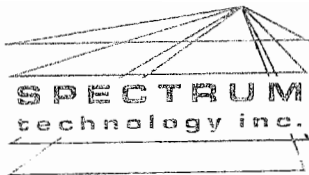


EXHIBIT XIII - Cover Letters

New Certification Report for the

FCC ID: KBCIX260-PROG82BT

- 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.



209 Dayton Street, Suite 205  
Edmonds, WA 98020-3581

425 771-4482

425 771-9283 Fax

August 16, 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 22.901(d), 24E & 15.247 of physically co-located *mobile* transmitters.  
FCC ID: KBCIX260-PROG82BT  
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 IX260 is a ruggedized laptop PC which contains the following:

- 1) WAN, Cellular & PCS Dual band GSM GPRS /EDGE OEM radio modem previously certified by Sony Ericsson Mobile Communications AB., Model: GC82 under the FCC ID: PY7F1041011 and in the IX260 by ITRONIX Corp. most recently under the FCC ID: KBCIX260MPIGC82 .
- 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: KBCIX260MPIA555BT 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 22 and 24. The test reports submitted were prepared originally for the FCC ID: KBCIX260MPIGC82. The original OEM test reports prepared by CETECOM are also submitted in support of this application. The newly identified device is physically and electrically the same as the original device with the exception of a new Intel PRO WLAN and the Bluetooth Intentional radiator 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.. Simultaneous transmit data is submitted for the two Part 15 Intentional Radiators as they can transmit simultaneously.

Exhibit 13

For Item 3, the Bluetooth device, we submit complete EMC measurement data previously used in support of Certification for the FCC ID: KBCIX260MPIA555BT. 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.

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

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

Please contact the undersigned for a prompt response should you requires any additional information concerning this request for Certification. We sincerely thank you for your time and consideration of this application.

Sincerely,

A handwritten signature in black ink that reads "Rod Munro". The signature is written in a cursive, flowing style.

Rod Munro

President  
Spectrum Technology, Inc.

Agent on behalf of ITRONIX, Corp.

Email: [rmunro@spectrumti.com](mailto:rmunro@spectrumti.com)



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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