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January 23, 2004

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

Re: Action requested - Class II Permissive Change to the current Certification under Parts 22.901(d), 24E & 15.247 of co-located portable transmitters

FCC ID: KBCIX260MPIA555BT
Grantee: ITRONIX, Corporation

Gentlemen:

On behalf of ITRONIX, Corporation we request a Class II Permissive Change to allow "portable" operation of the above referenced device that is presently Certified for "mobile" applications. The IX260 is a ruggedized laptop PC which contains three internally integrated co-located transmitters:

- 1.) Cellular & PCS Dual band GPRS transmitter previously Certified by Sierra Wireless, Inc., FCC ID: NCNAC555 operating under Parts 22.901(d) and 24E.
- 2.) WLAN 802.11(b) previously Certified Intentional Radiator by CISCO Systems, Inc., FCC ID: LDK102042 under Part 15.247 for DTS devices.
- 3.) A Bluetooth Intentional Radiator previously Certified by Mitsumi, FCC ID: POOWML-C11XX under Part 15.247 DSS rules for FHSS.

For Item 1 above, EMC test reports covering radiated spurious and harmonic emissions are submitted supporting Certification under Parts 22 and 24. For Items 2 and 3 we have submitted EMC test reports covering radiated spurious and harmonic emissions for these transmitters and their individual antenna combinations under Part 15. Simultaneous transmit data for the two Part 15 Intentional radiators is also included. SAR data is submitted for this combination of three transmitters.

We will be referring to the original manufacturers Certification test data contained in the original exhibits where appropriate. These three OEM models would be considered "identical" to the originally approved device as defined by Part 2.908.

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

Sincerely,

A handwritten signature in black ink that reads "Rod Munro". The signature is fluid and cursive, with the first name "Rod" being particularly prominent.

Rod Munro

President
Spectrum Technology, Inc.
Agent on behalf of ITRONIX, Corp.
Email: rmunro@spectrumti.com