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July 05, 2002

Federal Communications Commission
Authorization & Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21046

Attention: Authorization & Evaluation Division

Reference: P7QNPM-7

The above referenced item complies with 47 CFR 22.919 as follows:

The Electronic Serial Number (ESN) for each transceiver is unique.

The ESN host component is permanently attached to a main circuit board of the mobile transmitter and the integrity of the unit's operating software is not alterable. The ESN is isolated from fraudulent contact and tampering.

The host component does not contain other information; is not removable and its electrical connections are not accessible.

The ESN is factory-set and is not alterable, transferable, removable or otherwise able to be manipulated. Cellular mobile equipment is designed such that any attempt to remove, tamper with, or change the ESN chip, its logic system or firmware originally programmed by the manufacturer will render the mobile transmitter inoperative.

VERTU LTD.

Per:

MARK POPE

Manager Test & Type Approvals