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January 19, 2005

Federal Communications Commission
Authorization and Evaluation Division
C/O AmericanTCB, Inc.
6731 Whitter Avenue
McLean, VA 22101

Re: Attestation of compliance for mobile configuration, (20 cm min. antenna to user)
FCC ID: KBCIX300AC775BT Applicant: ITRONIX, Corporation
Models: IX300 with AirCard 775, (WAN), Parts 22H, & 24E, and MUBTC2-TH, (Bluetooth) Part 15.247.

Gentlemen:

Spectrum Technology, Incorporated has tested the above referenced rugged Mobile Tablet PC with two co-located transmitters. Measurements were made in accordance with the applicable requirements contained in the Parts 2, 15.247, 22H and 24E of Title 47, CFR. To the best of my knowledge, these tests were performed using the criteria established in ANSI, TIA-603-B and ANSI C63.3 as applicable.

Measurements of the IX300 Tablet PC were made to determine continued compliance when the co-located radio modules are operated simultaneously in pair as they could in the field. In this product the Bluetooth *can* transmit at the same time as can the WAN. The radio modules are physically and electrically identical to the originally certified modules as defined by Part 2.908. The results of the measurements referenced below demonstrate the equipment complies with the Part 15 and Part 22H and 24E limits, with the referenced RF devices installed and simultaneously transmitting.

1.) Test Report # 1 – Supplemental EMC measurements were made for a previously Certified transmitter, a Sierra Wireless, Inc., FCC ID: N7NAC775, Model: AirCard 775, operating under Part 24E. Measurements were made to check the co-located simultaneous transmit for radiated spurious emissions, and measure the transmitter EIRP under Parts 22H and 24E when the approved modular device is located in the IX300 Tablet PC. The original Sierra Wireless test report is referenced for all relevant conducted test data.

2.) New EMC measurements of a previously Certified Bluetooth Intentional Radiator, the Billionton Systems, Inc., FCC ID: NLF-MUBTC2-CLEVO, to confirm continued compliance under Part 15.247 DSS rules for FHSS when installed co-located in the IX300 Tablet PC. The original conducted test report data prepared by CSC for Twinhead International Corp. is referenced in this application.

The digital device emissions were measured and verified to meet the Part 15.107(a), 15.207(a) conducted emissions limits from .150 to 30 MHz and 15.109, (a) radiated emissions limits from 30 to 1000 MHz applicable to Class B digital devices. The applicable rule sections are listed in the test reports uploaded under Exhibit 6.

The open area test site used for the radiated emissions measurements is located at Fluke Park II in Everett, Washington. The site information required by Part 2.98, measured in accordance with ANSI C63.4-1992, was most recently renewed with and accepted by the FCC Sampling and Measurements Branch in August of 2004. This site is also acceptable to Industry Canada for the performance of radiated measurements. Test site information required by RSS-212, Issue 1 (provisional) was most recently renewed with IC in January 2002. The site file number is IC 2089.

Sincerely,

Rod Munro
President
Spectrum Technology, Inc.
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