

January 14, 2004

Federal Communications Commission

RE: Application for Limited Modular Approval Certification for BT-20 Bluetooth Module

Dear Sir or Madam:

The following information addresses the requirements to support a limited modular approval as required by the FCC Public Notice DA 00-1407 "Part 15 Unlicensed Modular Transmitter".

| 1 | The BT-20 Bluetooth module has been tested in the ML900 which does not provide shielding. The module does have grounding pins, but does not have a shielded cover.        |
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| 2 | The BT-20 Bluetooth module does have buffered data inputs.  |
| 3 | The BT-20 Bluetooth module has its own power supply regulator. The module will be integrated in the ML900 which also offers power supply regulation.                      |
| 4 | The ML900 has a Bluetooth antenna that complies with section 15.203 of the FCC rules. The antenna is permanently attached (see attached antenna specifications).          |
| 5 | This BT-20 Bluetooth module has not been tested standalone. It has been tested internal to the ML900 and it will always be integrated internal to the ML900.              |
| 6 | The modular transmitter will be labeled as required. The ML900 will also be labeled as required.  |
| 7 | Operational requirements have been added to the manual (refer to the User's Manual).  |
| 8 | The ML900 has been classified as mobile. There will be a cautionary statement added to the manual stipulating the 20 cm separation distance (refer to the User's Manual). |

If there are any additional questions or if further information is needed, please contact me at your earliest convenience at (847) 538-4968.

Sincerely,

Steve Surwillo Portfolio Manager

Mobile Data Subscriber Operations