

EXHIBIT XIII - Cover Letters

New Certification Report for the

FCC ID: KBCIX300AC775BT

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| 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. |



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January 19, 2005

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

Re: Action requested: Certification of co-located *mobile* transmitters (20 cm antenna to user)
Grantee: ITRONIX, Corporation
FCC ID: KBCIX300AC775BT

Gentlemen:

On behalf of ITRONIX, Corporation we request Certification under Parts 15, 22 and 24 for the IX300 as a mobile device with the three internally integrated co-located transmitters. The IX300 is a ruggedized Tablet PC that contains the following Transmitter and a Intentional Radiator:

- 1.) PCS Transmitter previously Certified by Sierra Wireless, Inc., FCC ID: NCNAC775 operating under Parts 22H and 24E
- 2.) A Bluetooth Intentional Radiator previously Certified by Billionton Systems, Inc., FCC ID: NLF-MUBTC2-CLEVO under Part 15.247 DSS rules for FHSS.

For Items 1, and 2 we have submitted EMC test reports covering EIRP, radiated spurious and harmonic emissions for these three transmitters and their individual antenna combinations. Measurement data addressing simultaneous transmit of the co-located transmitters is also provided. We will be referring to the original manufacturers Certification test report data for some of the conducted measurements where appropriate. All OEM models would be considered "identical" to the originally approved device as defined by Part 2.908. The AirCard 775 uses the identical antenna it was originally approved with in the Sierra Wireless, Inc. OEM filing.

MPE calculations according to the FCC training materials from May 2003, are in Exhibit 11, and are submitted for multiple frequency exposure criteria. The ratio of the field strength or power density to the applicable exposure limit at the exposure location was determined for each transmitter and the sum of these ratios does not exceed the 1mW/cm² limit for General Population/Uncontrolled. In this product the WAN and Bluetooth *can* transmit at the same time.

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

Sincerely,

A handwritten signature in blue ink that reads "Rod Munro".

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



ITRONIX®

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January 25, 2005

American Telecommunications Certification Body, Inc.
6731 Whittier Avenue
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TO WHOM IT MAY CONCERN

Pursuant to Paragraphs 0.457 and 0.459 of the Commission Rules (47 C.F.R.) and section 552(b) (4) of the Freedom of Information Act, Itronix Corporation requests confidentiality for the following product:

FCC ID: KBCIX300AC775WL

FCC ID: KBCIX300AC775BT

For the products stated above, we request that the following information be held confidential:

Schematic diagrams.

Parts List.

Tune-up Procedure.

Operational description.

Block Diagrams

No other items submitted as part of the equipment authorization filing process are deemed confidential. The above exhibits contain Itronix Corporation and Sierra Wireless Corporation Trade secrets and proprietary information that could be of benefit to our competitors regarding the design of our mobile PC Card. This material is not customarily available to the general public and we request that it be withheld from public inspection.

If you have any questions, please feel free to contact me at address shown below.

Sincerely,

Richard Sargent
Sr. Manager Agency
ITRONIX CORPORATION



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January 25, 2005

American Telecommunications Certification Body, Inc.
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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
Sr. Manager Agency
ITRONIX CORPORATION