

ORION ELECTRIC CO., LTD.

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Letter Of Agency

Date: December 4, 2002

American Telecommunications Certification Body, Inc.
6731 Whittier Avenue
Suite C110
McLean, VA 22101

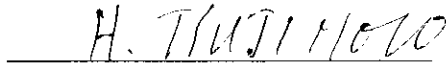
To Whom It May Concern:

Please be advised that ORION ELECTRIC CO.,LTD. authorizes A-Pex International Co., Ltd. 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.

Signatory



Hiroshi Tsujimoto
Section manager
Engineering headquarters
Administration section