

THALES

THALES NAVIGATION

471 El Camino Real
Santa Clara, CA 95050 USA
T: +1 408 615 5100
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www.thales-navigation.com

American TCB
6731 Whittier Avenue
Suite C110
McLean, VA 22101

August 27, 2003

Re: Regulatory Testing and Certification of Thales Navigation Z-Max

Gentlemen:

This is your letter of authorization to accept the appointment by Thales Navigation, with headquarters at 471 El Camino Real, Santa Clara CA 95050, and offices in San Dimas, California and Carquefou, France, of Elliott Laboratories, Inc. as our regulatory testing and certification agent for the limited purpose of signing applications before the Federal Communications Commission and to make representations to you on our behalf relating to the Thales Navigation Z-Max products. Elliott Laboratories is to receive and exchange data between Thales Navigation and the Commission. This authorization is made pursuant to Section 2.911(c) of the FCC Rules and expires upon completion of the certification process (as soon as possible).

I hereby certify on behalf of Thales Navigation ("Applicant") that neither Applicant nor any party to the application (officers, directors, and 5% shareholders) is subject to a denial of Federal benefits that includes FCC benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853a.

Sincerely,



Elissa Wellikson
Vice President and General Counsel

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Request for Confidentiality

September 9, 2003

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

RE: Certification Application
FCC ID: NZI800963, NZI110896

Please be advised that the following information is to be held confidential on behalf of Thales Navigation, Inc.:

- Schematics
- Operational descriptions
- Block diagrams

The application contains technical information, which Thales deems to be trade secrets and proprietary. If made public, the information might be used to the disadvantage of the applicant in the market place.

Thank you for your attention to this matter.



Christian Legras
Hardware Engineering Manager

5) The FCC ID listed in the operational description (IHDT6ZC1) listed on page 1 is not for a PCS module, but instead a DeskSet phone. Note that the frequency range, emissions designator and other data for this FCC ID do not appear to match the information for this application. Please explain.

The operational description has been corrected to reflect the appropriate FCC ID for the GSM module as listed at the top of each page.

6) Please provide a parts list for this application. Note that the schematic of the TX only contains reference designators.

The schematics have been updated with the appropriate parts list. As the parts list is to be held confidential, and the confidentiality request asks that the schematics be held confidential, they are to be considered a part of the schematics.

EMC

7) FYI... The theory of operation mentions a conducted output power of +30 dBm, while the test report shows a EIRP power 5.2 dBm. The SAR report offers an explanation for this. Portable device under Part 24 are required to list output power as EIRP. We propose that because of the difference in power, and the fact that Thales Navigation may desire to solve the EIRP problem in the future, to place the conducted power on the grant line with the EIRP power listed in the grant notes. This should allow flexibility to do a Permissive change assuming the conducted power stays the same. Otherwise by placing the EIRP on the grant line would require a new FCC ID every time the EIRP changed.

This would be appreciated. Thales is investigating the use of alternative antennas and the use of a Permissive Change rather than a new device approval would make life much easier.

8) The FCC ID on page 2 of 27 of the test report is listed as TBD. Please explain as it was assumed that the same FCC ID would be placed on each model listed.

When the report was first drafted the FCC ID was not finalized. The same FCC ID will be placed on each Com Module that contains the GSM module. The "TBD" has been replaced with the correct FCC ID.

9) Page 3 of 27 of the test report appears to contain some missing information regarding the bluetooth and PCS items listed. Please correct.

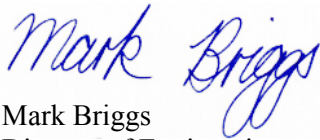
The report has been corrected to include the missing information.

In addition to this document, the following files have been uploaded to the ATCB website to support the above responses:

- External Photographs (Revised).pdf
- Internal Photographs (Revised).pdf
- Addendum to Operational Description.pdf
- AC-EX12 Theory of operation (Revised).pdf
- R52759-revised.pdf
- SAR Report.pdf
- SAR Report Appendix A.pdf
- SAR Report Appendix B.pdf
- SAR Report Appendix C.pdf
- AC-EX05 schematics (Revised).pdf
- Attestation Letter.pdf
- Separation Distances.pdf

If you have any additional questions please do not hesitate to contact me via doc@elliottlabs.com.

Regards,



Mark Briggs
Director of Engineering

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FCC Labeling Requirements and Information

September 9, 2003

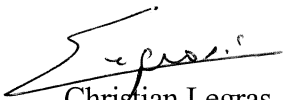
American Telecommunications Certification Body, Inc.
6731 Whittier Avenue
Suite C110
McLean, VA 22101

RE: FCC Labeling Requirements
FCC ID: NZI800963, NZI100896

The following label information is required by the FCC Rules and Regulations for certified devices. Also attached, please find marketing information required by the FCC Rules and Regulations.

Thank you for your attention to these matters.

Sincerely,



Christian Legras
Hardware Engineering Manager

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Manufacturer's Letter

September 9, 2003

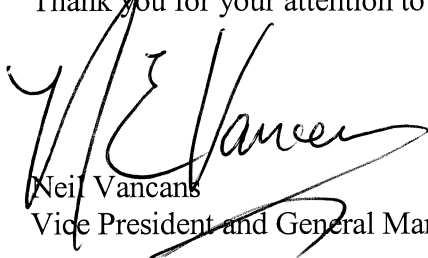
American Telecommunications Certification Body, Inc.
6731 Whittier Avenue
Suite C110
McLean, VA 22101

RE: Certification Application
FCC ID: NZI800963, NZI110896

To Whom It May Concern:

Please be advised that the manufacturer will ensure that the above-referenced models will be manufactured in accordance with the FCC Rules and Regulations.

Thank you for your attention to this matter.



Neil Vancans
Vice President and General Manager