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December 2, 2005

American TCB, Inc.
6731 Whitter Avenue
McLean, VA 22101

Subject: KBCIX260MPIAC775

Reply to Item 2) comments from ATCB November 23, 2005 correspondence:

2) Section 15.15(b) prohibits adjustments of any control by the user that will cause operation of a device in violation of the regulations. Accordingly, any proposal to allow the end user to choose extended channels on frequencies outside of an allowable frequency band in the USA is not acceptable. For example, a WLAN device operating according to Section 15.247 on channels 1-11 between 2.4 - 2.483.5 GHz must not have any user controls or software to allow the device to operate on channels 12 and 13 which are outside of the allowed USA band. For instance, the user should not be able to select alternative countries which would allow different channel plans outside of the allowed USA band. Please explain how this device is compliant to this requirement.

The device is compliant with the referenced requirement based on the following: Itronix only ship the CISCO AIR-MPI, WLAN cards pre-configured from the factory for specific "regulatory domains". The cards configured for the US only operate on channels 1-11, and cannot be modified by end users to enable additional channels. Only the pre-configured "US regulatory domains" are shipped to our US customers.

This filing is being done to cover an existing installed base of the approved FCC ID: KBCIX260MPIAC750 which contains the previously approved CISCO WLAN Radio FCC ID: LDK102042. Our customer simply wishes to simply upgrade from the Sierra Wireless, PCMCIA Certified FCC ID: N7NAC750 radio to the FCC ID: N7NAC775.

Regards,

Richard Sargent
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ITRONIX CORPORATION