

To Tim Harrington, William Graft, Dennis Ward

Response to questions for FCC ID: KBCIX300AC555WLBT

Thank you for your time.

Richard Sargent

Itronix Corporation

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-----Original Message-----

From: OET Generic account [mailto:oetech@fccsun34w.fcc.gov]

Sent: Tuesday, April 20, 2004 9:14 AM

To: hotline@americantcb.com

Subject: audit

To: William Graff

From: Tim Harrington

Tim.Harrington@fcc.gov

FCC Equipment Authorization Branch

Re: FCC ID: KBCIX300AC555WLBT

Applicant: Itronix Corporation

Correspondence Reference Number: 12058

731 Confirmation Number: TC677913

Date of Original Email: 04/20/2004

Subject: audit

TCB to address:

1) Need better RF exposure user instructions about near-body transmit use (lap-held, shoulder strap).

Response from Itronix Corporation. See attached Warning changes. Added---
When using Radio's Users must
Maintain 20 cm from all antennas. It is recommend that radios only be
operational when in desk mount or on desktop locations. Do not operate
Radio's when transporting with shoulder strap, Lap-held or hand-held
positions.

2) It is assumed that this device is used at least in a handheld Configurations. Note that FCC device RF exposure category portable applies when any part of person's body is within 20 cm from a device. Handheld, hand-operated only devices are category portable, but can often be considered to operate in mobile RF exposure conditions (20cm or more spacing) with respect to a person's body.

Response from Itronix Corporation. See attached Manual changes. Added-- When
using Radio's Users must
Maintain 20 cm from all antennas. It is recommend that radios only be
operational when in desk mount or on desktop locations. Do not operate
Radio's when transporting with shoulder strap, Lap-held or hand-held
positions.

3) May need better RF exposure user instructions about hand placement with respect to active antennas. Please submit photos for typical handheld use modes, including different screen modes portrait, landscape, 180 deg, if applicable.

Response from Itronix Corporation. See attached Manual changes. Added--- When using Radio's Users must Maintain 20 cm from all antennas. It is recommend that radios only be operational when in desk mount or on desktop locations. Do not operate Radio's when transporting with shoulder strap, Lap-held or hand-held positions.

4) FYI:

a) Original FCC IDs on the internal modules are not applicable for the FCC ID of this filing - please consider to add notice as such in user manual.

Response from Itronix Corporation. See attached Manual changes. Added--- Each internal radio may or may not have an individual FCC Identifier label. That FCC Identifier label is not applicable to this configuration. Only the external FCC ID is applicable.

b) Any changes (Class II, etc.) to the transmitter modules under unrelated FCC ID certifications need to be accounted for under the FCC ID of this filing for modules in notebook computer.

Response from Itronix Corporation. Itronix Corporation is advised of this.

5) Please confirm that handheld computer with the FCC ID of this filing will always be marketed and delivered only when all three transmitters are installed. Lesser combinations need different FCC IDs, or modular approvals and labeling schemes if appropriate.

Response from Itronix Corporation. Itronix Corporation is advised of this and will label with appropriate FCC ID for each different configuration.

6) Similar to previous question, GoBook Tablet spec sheet states: "GPRS - CDMA - 802.11b WLAN - Bluetooth - (various combinations available depending on specific requirements)

- Up to 3 RF modems can be integrated at one time"

<http://itronix.gol80.net/Home.asp>

<http://itronix.gol80.net/upload/specifications/us/gobooktablet.pdf>

Please explain how FCC ID labeling requirements are handled for "various combinations."

Response from Itronix Corporation. Itronix Corporation is advised of this and will label with appropriate FCC ID for each different configuration. Specific FCC ID's will be obtained for each radio combination.

7) Please describe process for transmitter and FCC ID label installation for the Part 24 device. What is client or end-user involvement in the process?

Response from Itronix Corporation. There is NO client or end-user involvement in the labeling of the IX300 with a Part 24 device. ITRONIX CORPORATION Factory configures these options and applies appropriate FCC ID for each configuration. Field upgrades are done by authorized service personal where appropriate labels are supplied with radio upgrade kit.

8) How is compliance with 15.203 and 15.204 accomplished such that unauthorized Bluetooth or LAN cards are not installed by end-users?

Response from Itronix Corporation. The Bluetooth and WLAN modules do not have standard communication's I/O or power connectors. They are modules however, not a standard bus type card. It would be impractical for the common user to modify for a different Bluetooth or WLAN module. The Bluetooth and WLAN modules and their antenna are internally integrated within the IX300 and are NOT accessible with out using tools to remove external covers on the IX300. Both Bluetooth and WLAN antenna are integrated within the IX300 in such a manner that substitution of a different antennas would not be practical due to space constraints and are NOT user accessible without major disassembly of the IX300.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal pursuant to Section 2.917(c).

DO NOT Reply to this email by using the Reply button. In order for your response to be processed expeditiously, you must upload your response via the Internet at www.fcc.gov, E-Filing, OET TCB Electronic Filing, TCB Login. If the response is submitted through Add Attachments, a message which informs the processing staff that a new exhibit has been submitted must also be submitted via Submit Correspondence. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.