

August 29, 2005

RE: Itronix Corporation

FCC ID: KBCIX600-BT

Here are our answers,

1) Page 1 of the internal photographs and page 2 of the labeling exhibit shows a WLAN device also installed in the device. If this is not covered by this version of the application, please correct.

**Ans: I have deleted this page, and modify page 2 of the labelling
Please see revised files, 1)internal photo 0826.pdf, 2) Label & location 0826.pdf**

2) Please provide information regarding the gain of the antenna. Note that with a low enough output power, a 20 cm statement would not be necessary. Please consider providing a more detailed RF exposure exhibit similar to that given in the attached example.

Ans: Please see revised files, 1) RF exposure statement 0826.pdf

3) The safety information given in the Regulatory portion of the manual specifically regarding the BT appears incorrect. First 20 cm spacing is not necessary for this device (Bluetooth only version). Second the information suggests the antennas are in the upper part of the display, which is not correct for the Bluetooth. Please correct as necessary.

**Ans: I have deleted the wordings
Please see revised files, 1) RadioSpecificSafety-bluetooth 0826.pdf**

4) Page 34 and 36 of the users manual recommends a ferrite to be installed on phone, audio, and USB cables. However was a ferrite required to meet FCC requirements, or is this only a recommendation. Note that if they were required, then the FCC requires that you provide these cables to the user with the ferrites pre-molded. This would likely create a problem for the USB and audio cables because of their different uses/designs.

Ans: This only a recommendation. The ferrite would not be sold with NB PC in market .

5) 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 for all 802.11 bands of operation.

Ans: Waiting information from client

6) FCC requires testing to ANSI C63.4-2003. The report does not seem to reference this.

Please review.

Ans: Please see updated report

7) Theory of Operation mentions +4 dBm output maximum. The maximum reported in the test report is only -0.69 dBm. The FCC expects the device to be tested at maximum output power. If maximum output power was not present during testing, this device will require retesting. If maximum output power was already present, then the users manual must be adjusted. Please review.

Ans: According to the Technical Specification, the output power is between -4dBm to +4dBm. During testing, it was tested by maximum transmitter power setting of test software. -0.69dBm is within the range of the Specification, isn't it?

8) Calculations in section 4.7.3 appear to make some incorrect assumptions. Please review additional attachments that show more typical information. Please correct as necessary.

Ans: Thanks for your suggestion. It has been corrected. Please see updated report from Page 30-35.

9) FYI.....This device is also approved under a DoC. However all the information required by 2.1077

Ans: The device has been tested, and complied with FCC Rules Part 15 Subpart B Class B.

Please review

Best Regards,

Daphne