



June 14, 2001

Federal Communications Commission  
Equipment Approval Services  
7435 Oakland Mills Road  
Columbia, MD 21046  
Attn: Joe Dichoso

**SUBJECT: Itronix Corporation  
FCC ID: KBCIX250RIM802  
Class II Permissive Change  
731 Confirmation No.: EA100800  
Correspondence Reference No.: 19380**

Dear Joe:

On behalf of Itronix Corporation is an amendment in response to your e-mail dated May 22, 2001 requesting additional information for the subject application.

1. The conducted RF power measurement between the original application grant and Class II Permissive Change are different due to the following reason. On the original grant application, the test lab measured the RF power at the PCMCIA card. For this Class II Permissive change, a connector was provided to measure the RF power at the antenna port. Internal to the laptop computer is a coaxial cable running from the PCMCIA card to the antenna port with approximately 1.5dB loss at the appropriate frequency. For the Class II Permissive Change the conducted RF power for the radiated emissions and SAR measurements were measured at the antenna port. All conducted EMC measurements for both grant applications were performed at the PCMCIA card. Please find attached the revised radiated test data and SAR test data listing the conducted power output without the cable loss as listed on the original filing (33 dBm). Please note that the difference in the ERP levels between the original grant and the Class II Permissive Change are due to the fact that the gain of the dipoles were taken into account during the signal substitution method.
2. The maximum operating duty cycle for this device is 25% (please see attached letter from applicant) and was tested at 25% duty cycle for the original filing. Therefore we have subsequently retested the device for SAR at 25% duty cycle and the revised SAR test report and data is attached.
3. Attached is the users manual for the IX550 with appropriate RF exposure warning statements.

If you have any further questions or comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn McMillen", written over a horizontal line.

Shawn McMillen  
General Manager  
Celltech Research Inc.  
Testing & Engineering Lab

cc: Itronix Corporation