

December 14, 2005

RE: ITRONIX, Inc.
FCC ID: KBCIX260MPIAC775

Reply to ATCB comments of November 23, 2005. The replies with the text in black are from Spectrum Technology. The replies prefaced by [Sierra] in blue are from Sierra Wireless and those prefaced in [Itronix] in green are from Itronix, Corporation for your reference.

- 1) [Sierra] The internal photo originally provided by Sierra Wireless was taken without shields. The TCB possibly mistakenly identified the big capacitor with the Sierra Wireless p/n 3000874 labeling, as the shield in the first of two photos.
- 2) [Itronix] The CIISCO WLAN comes preprogrammed for specific regulatory domains from the factory. The cards configured for the US only operate on channels 1-11, and cannot be modified by end users to enable additional channels. An attestation letter from ITRONIX has been uploaded addressing this issue file named: "American TCB, Inc Letter USA Frequencys.pdf."
- 3) The GPRS modem does support two antennas. The blade antenna data sheet has been uploaded file name "Blade Ant PCS 47-0170-001_ant_4.3 inch".
- 4) Bear in mind that this is an existing "legacy" MPI350, WLAN, product originally Certified as a limited modular device in the existing IX260 with thousand of units in the field today. As such I don't believe it can be held to a standard not applicable at time of the original limited modular Certification. Having said that, the changes from C63.4 -1992 to ANSI C63.4-2003 would not be expected to have any material impact on the validity of the previous measurement data submitted.
- 5) The missing band edge data was has been uploaded as file name "MPI350 Restricted Band Edge" for your review.
- 6) The upgradeable aspect refers to the fact that the IX260 is available with various combinations of WAN, WLAN and BT radios. All of which have there own FCC ID's as composite or limited modular filings. There are currently some 23 different Certifications for the IX260 with the MPI350. This instant filing is an example of how Itronix handle the addition of new radios in to their wireless product mix. Via Certification approvals for each of the various new combinations.
- 7) The advertising reference to user replaceable modules refers to the fact that the PCMCIA cards can be replaced to allow quick field replacement of failed RF devices. The WAN radio is a PCMCIA slot located behind a cover and the WLAN is a mini PCI card also located behind a cover. A screw drive is required to access either device unlike the regular PCMCIA slot on the side of the IX260 which has a flip down cover. The user is advised in the User Specific RF Safety statement provided by ITRONIX which FCC ID or ID's are approved with the IX260. Neither ITRONIX nor any other PC manufacture can prevent unauthorized user actions with any PCMCIA slot. All radio combinations sold by ITRONIX are approved prior to marketing to their clients. This application is a clear example of this commitment.
- 8) [Sierra] For a Class 12 device, the source based duty cycle is 50% at the most. No need to adjust MPE exhibit.
- 9) [Sierra] The requested information is Confidential and has been uploaded as a separate document " CONFIDENTIAL Answer to Q9(AC775).pdf".

- 10) The MPI350 and AC775 manuals contain the referenced FCC statements on page 3 of the CISCO manual and Chapter 9 of the Sierra Wireless manual.
- 11) Please refer to the conducted data in the Sierra Wireless OEM report on page 6 of 60, with reference to the 8-PSK results.
- 12) [Sierra] Please see the attached updated test report from Sierra Wireless file named "AC775_Temperature_stability" addressing this issue.
- 13) FYI Noted forwarded comment to OEM.
- 14) FYI Understood
- 15) FYI Noted. Numerous other configurations are presently covered by other FCC Identifiers and new combinations may be added over time.
- 16) FYI Noted.
- 17) FYI Noted agreed. The WAN and WLAN do not transmit at the same time.
- 18) [Itronix] A revised IC/FCC identifier label showing model and Certification number has been uploaded for your review.
- 19) The REL letter should be located on page 5 of 6 of the exhibit titled "IC Application Agreement Form 1943A-IX260e w_ATCB acknowledgement of IC listing and LOA".
- 20) The new RSS-102 and the ATCB attestation form have been uploaded.
- 21) The vehicular mount has a detachable connector for an external vehicular antenna for the AC775 only. The WLAN has no external antenna connection. [Itronix] A revised file named "RadioSpecificSafety KBCIX260MPIAC775 Rev 3.pdf" has been uploaded for your review.
- 22) The OEM IC DTS/WLAN receiver data has been uploaded for your review. Please refer to test report page 45 of the test report which is page 52 of 54 in the pdf file named "AIR-LMC352 Canada Report ". [Sierra] Please see the attached document "Individual IC Test1". For the AC775 receiver emissions data.
- 23) The user manual does not contain the two part statement from 7.1.5 but the statement is located on the back of the PC which is permissible under the standard which states: *"The above statements may be placed on the device instead of in the manual."* Copy of this label can be found in Exhibit 1Rev1.pdf.
- 24) [Sierra] Please see attached document. "Declaration of IMEI Security AC775"
- 25) FYI Noted forwarded comment to OEM.
- 26) FYI Noted forwarded comment to OEM.

Thank you for your time spent reviewing this reply to your comments.

Best Regards,

Rod Munro

Email: rmunro@spectrumti.com