

August 31, 2004

Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Stan Lyles

SUBJECT:

**ITRONIX CORPORATION
FCC ID: KBCIX100XA750WLBT
Part 15.247 - Certification
731 Confirmation Number: EA404642
Correspondence Reference No.: 27402**

Dear Stan:

On behalf of Itronix Corporation is our response to your e-mail dated August 18, 2004 requesting additional information for the subject application.

1. Please see attached SAR measurement data sheet showing the sum of the 1-gram averaged SAR levels for WLAN/Bluetooth and GPRS transmit in the max. SAR test position, in order to report a worst-case SAR level for simultaneous transmit operation. Also attached are spectrum analyzer plots showing that the relative radiated output power does not increase during simultaneous transmit operation in each configuration.
2. Please see attached revised user manual. The "0.5 cm gap with no metallic component" statement has been removed and the condition is limited to the specific carry case tested. Please note that the 0.5 cm gap referred to the thickness of the carry case.
3. Please see attached WLAN area scan measurement plots showing peak SAR locations for the backside of the device with and without the carry case. Please note that the calculation of the 1g-averaged SAR level is dependent on the accuracy of the extrapolation of the SAR values between the lowest measurement points and the surface. When the strength of the E-field gets close to the ambient electrical noise level this extrapolation is subject to errors. The DASY4 system detects an error and warns of possible amplified values. In this case, 1g-averaged SAR values were not reported because the levels of the signals were too low and the evaluated SAR levels were amplified, therefore the peak values of the area scans are reported.
4. We have submitted a Form 731 DSS application with appropriate exhibits for the Bluetooth transmitter portion of the internal WLAN/Bluetooth combo transmitter. We respectfully request an expedited review of the Bluetooth application.

If you have any further questions or comments concerning the above, please contact the undersigned.

Sincerely,



Jonathan Hughes
General Manager
Celltech Labs Inc.

cc: Itronix Corporation