425 771-4482

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October 13, 2003

Mr. Martin Perrine mperrine@fcc.gov FCC Equipment Authorization Branch

Re:

FCC ID: KBCIX260MPIA750BT Applicant: Itronix Corporation

Correspondence Reference Number: 9445 731 Confirmation Number: TC133864 Date of Original Email: 09/22/2003

Subject: Reply to request for additional information email 09/22/2003

Your original questions are listed as Q 1 – Q3 will the reply below each.

- Q1) Please provide details of chosen method to avoid FCC ID label confusion in accordance with the following statement. We have noticed that with some products with internal transmitters such as laptops or PDA's, an incorrect FCC identifier can be seen when the product is opened up by the end user while installing an internal component such as a memory card. We are concerned that this may cause some confusion as to which FCC identifier is valid. Therefore, we suggest that the manufacturer implement some method to avoid this issue. Although we prefer that the manufacturer remove or cross out the incorrect label, other methods such as user warnings (external label or manual statements) may be acceptable.
- 1.) ITRONIX Corp. has chosen to add the wording below to the product manual for the IX260. Attached please find file: Exhibit 8 User Cautions Revised ManuallegalIX260MPIA750BT rev2.
  - "The GOBook II (IX260) computer may have multiple transmitters installed. Each radio may have an individual FCC identifier. Only the FCC identifier on the Itronix Label is Valid for this configuration.
- Q2) Please detail the location(s) of the exposure evaluation. How was this location determined? The FCC understands that the evaluation was performed at a distance from the antenna not at the antenna terminal. However, there is more than one antenna and colocation techniques must be used to determine the maximum location. Please provide additional details of how the location of maximum exposure was performed.
- 2.) The location of RF exposure was at the antenna terminal. The calculations provided in Exhibit 11 were based on the measured power output at the antenna terminal for each of the transmitters. We would expect that the measured levels at the antenna terminal would represent a worst case level when calculated using max. power, max. antenna gain, and the summing of all transmitter power. Further no cable loss for the cables from the transmitter terminals to their respective antenna's is included in this calculation would reduce the level a minimum of 1.3 dB at 1850 MHz and 1.6 at 2450 MHz. Attached is a Simplistic Co-location Sample for the three transmitters to show the summed power density based on a modified sample Excel calculations from the TCB Session 8 (modified to sum the power density for 3 transmitters), see attached file: Tri locate MPE EXCEL Spreadsheet KBCIX260MPIA750BT. Also attached is a file named: Cell Calculations for Tri locate MPE EXCEL Spreadsheet KBCIX260MPIA750BT, that should display the formula for each cell. I would be glad to

provide a separate Excel copy via email if you would care to look at it in more detail in Excel rather than after being converted to a PDF when uploaded.

- Q3) Please discuss the reason for the division by 5 in the second table on page 1.
- 3.) This original Exhibit 11 filed had the type-o mistake listing the 5 on the second table on page 1 which had been corrected to 1 and replaced during the TCB review. The original rather than the revised file was inadvertently submitted to the FCC. The correct revised file Exhibit 11 MPE for Pt 24 & 15.247 Rev1 is attached.

The Grantee has been advised that this FCC ID cannot be used when any one of the transmitters has been depopulated from the laptop. All transmitters must be present.

I hope that we have addressed the questions to your satisfaction.

Best Regards,

Rod Muns

Rod Munro