December 20, 2004

Federal Communications Commission
Authorization and Evaluation Division
C/O American TCB, Inc.
6731 Whitter Avenue
McLean, VA 22101

> Applicant: Itronix Corporation
> Correspondence Reference Number: 15921
> 731 Confirmation Number: TC671435
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>
> Subject: access

Tim Harrington,

The referenced kneeboard option shown at the link provided
http://itronix.go180.net/Products/tablet/tablet6.html, is an option originally
supplied for a military contract for the IX300 configured with no radios installed so
the RF Safety issue was not applicable. ITRONIX marketing decided to add this
to the available IX300 options so it was just recently added to the website. It is
not ITRONIX intent that this option be used with the IX300 when configured with
the Radio options.   Not all configurations of the IX300 have radios.

The User Manual provided with the IX300 Certified under different FCC ID's,
states that "a minimum separation distance of 20 cm must be maintained
between the external dipole antenna and all users/bystanders."   The complete
text is stated below:

The GoBook Tablet PC (IX300) is a Mobile device. When using Radio's, Users must maintain 20
cm from all antennas. It is recommend that radios only be operational when in desk mount or on
desktop locations. Do not operate Radio's when transporting with shoulder strap, Lap-held or
hand-held positions. The GoBook Tablet PC (IX300) contains the radio transmitters listed below.
The following statements are relevant when using these radios: Each internal radio may or may
not have an individual FCC Identifier label. That FCC Identifier label is not applicable to this
configuration. Only the external FCC ID is applicable. Only the antenna with which an intentional
radiator is authorized may be used with the intentional radiator. "The AC750 antenna location is
in the upper right edge of the display screen and is not to be modified". "The WLAN embedded
antenna is located internally in the upper center edge of the display screen and is not to be
modified". "The BlueTooth embedded antenna is located internally in the left side edge of the
display screen and is not to be modified". This device contains a WLAN radio transmitter, a Sierra
Wireless AC750WAN radio transmitter and a Blue Tooth radio Transmitter. To comply with FCC

RF exposure requirements when using the Sierra Wireless AC750WAN radio transmitter, a minimum separation distance of 20 cm must be maintained between the external dipole antenna and all users/bystanders. When using the WLAN transmitter, a minimum separation distance of 20cm must be maintained between the top center edge of the LCD display and all users/bystanders. When using the Blue Tooth transmitter, a minimum separation distance of 20 cm must be maintained between the left side edge of the LCD display and all users/bystanders. The Sierra Wireless AC750WAN radio, WLAN transmitter, and the Blue Tooth should be turned off before carrying the Laptop PC order to comply with FCC RF exposure requirements.

ITRONIX Corporation is firmly committed to meeting both the letter and spirit of the RF safety regulations applicable all of their products.

In response to your concern of how the 20 cm grant note is compatible with the kneeboard system, ITRONIX propose to clearly advise any prospective user that the kneeboard option is <u>not</u> intended for use when configured with the Radios options turned on. The following page shows the two revised Web site references to the kneeboard option currently in the process of being posted to the ITRONIX website. Each kneeboard reference now clearly advises: "This accessory <u>not</u> intended for use with radio options. IX300's configured with radios <u>must</u> have the radios turned off prior to use with kneeboard system".

Please let us know if this method is satisfactory to address this concern.

Best Regards,

Rod Munro
Spectrum Technology, Inc.

Agent for ITRONIX, Corp.

Cc: Mark Harwood, Richard Sargent, ITRONIX, Corp.

Kneeboard Website Reference 1

This view shows the GoBook Tablet PC kneeboard system which supports one-handed operation in close quarters.

Note. This accessory not intended for use with radio options. IX300's configured with radios must have the radios turned off prior to use with kneeboard system.

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Kneeboard Website Reference 2

KNEEBOARD STRAP, LG STYLUS AND TETHER
Product: GoBook Tablet PC
Category: Miscellaneous/Kits

This case features a wedge shaped pad with strap to attach to the thigh allowing for comfort and easier viewing of the display. This accessory is for pilots to use to replace the traditional clipboard and pen method of recording data, viewing maps and missions, etc. The Kneeboard Strap also features a thumb-and-finger quick release clasp for emergency evacuations. Note. This accessory not intended for use with radio options. IX300's configured with radios must have the radios turned off prior to use with kneeboard system.

Weight: 0.48 lbs.
Part Number: 62-0393-001