



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

March 1, 2004

RE: Itronix Corporation

FCC ID: KBCIX260MPIBM3900

I have a few comments on the above referenced Application.

General

- 1) Please adjust the part 15 confidentiality letter to remove the Parts list. This information was not provide, nor is necessary for Part 15 applications.
- 2) It is uncertain how the MaxRad Z563 Unity Gain antenna is being considered for RF exposure (mobile/fixed). Please clarify and provide the power density at 20 cm if it is considered mobile.
- 3) It is uncertain how the 5 dBd Gain antennas are being considered. It appears that they will exceed the field density requirements for mobile antenna. Please clarify. Note that to be considered mobile, an MPE evaluation may be necessary. Additionally, this comment may likely affect the information given on page 49 of the users manual.
- 4) The 15.21 manual information (i.e. " Changes or modifications not expressly approved by the party responsible for compliance could void the users authority to operate the equipment.") given in the legal notices appear to be placed in the middle of the Part 68 information. It is uncertain if this was intended for the Part 15 requirements or Part 68 requirements. It is suggested that this be added to the Part 15 information portion of the users manual as well.
- 4) The device also appears to be approved using a DoC. as shown in the labeling for the whole device. However, specific information regarding the DoC must be given in the users manual or a separate sheet as shown below.

COMPLIANCE INFORMATION FOR DoC AUTHORIZATIONS (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page:

- (1) Identification of the product, i.e. name and model number.
- (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
- (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.

2.4 GHz DTS Transmitter Information

- 5) Please provide justification for use of the previous EMC data for the 2.4 GHz TX. For instance, is the lap top the same (including placement and type of antennas), power levels and TX board the same, etc, etc.
- 6) The 6 dB bandwidth measurements points do not appear to always be correctly taken. Note that the 6 dB bandwidth must take into account the widest points below the peak, not just at the first 6 dB null.

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- 7) It can not easily be determined if the device meets the new AC conducted emissions limits. The limit shown is the old limit and appears to show a point at 150 kHz that may exceed the new limits. Please provide better information to support the new conducted limits or let us know to proceed with the old limits. This is because the grant will be issued with one of the following grant notes depending on which set of limits it is shown to have met:

Current Limits

NOTE: The manufacture and importation of this device must cease on July 10, 2005 pursuant to 15.37(j) or 18.123 transition provisions adopted under FCC 02-157 (ET Docket 98-80).

Future Limits (CISPR)

NOTE: This device has shown compliance with the conducted emissions limits in 15.107, 15.207, or 18.307 adopted under FCC 02-157 (ET Docket 98-80) and may be marketed after July 11, 2005 and is not affected by the 15.37(j) or 18.123 transition provisions.

- 8) The bandedge tests do not appear to list the Internal Rangestar 802.11b Dual Surface-Mount (P/N: 100929) antenna in the data, therefore it is uncertain how these readings are considered applicable. Additionally it is uncertain what antenna was present during radiated spurious emissions testing. Please explain/correct as necessary. Note that the gain of the antenna used in this application appears to be 4.5 dBi, while the bandedge compliance tends to show that the worse case occurred with the dipole antenna.



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Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.