



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

January 2, 2005

RE: FCC ID: KBCIX300AC775WLBT_ATCB001936
Attention: Rod Munro

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please provide a photo of what is under the covered section of the first photo in the exhibit "Exhibit 9 Internal Photos AC775.pdf".
2. Please note that while you have provided the parts list for the BT and the WLAN, you have not provided the parts list for the licensed device. Please provide the parts list for the licensed device.
3. Please verify that this device cannot be used in any configuration where the antenna(s) are closer than 2.5 cm to the body. Please verify that no advertising or other documentation shows or indicates that this device can be used in this type configuration.
4. Please note that while the antenna conducted measurements provided may be used, the radiated emissions testing including the simultaneous transmission test data must be with the transmitters in the host listed in the filing (i.e. KBCIX300AC775WLBT). The simultaneous transmission data provided, while referencing the above ID, is listed as being from that of the AC555 device. Please explain.
5. Please note that the MPE report states that all three devices cannot transmit simultaneously. Please also note that the report "Exhibit 6 Test Report Simultaneous Transmit IX300 AC555 WLAN BT.pdf" states that all three devices can transmit simultaneously. Please explain and please reconcile all documentation as to the simultaneous operating capabilities of this device.
6. Please be precise as to what specific tests from the multiple reports apply specifically to this application. As you have a number of varying reports for different products it is important to clearly state what tests are deemed to apply to the specific application.

Dennis Ward
<mailto:dward@AmericanTCB.com>

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.



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Edmonds, WA 98020-3581

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January 5, 2005

ATCB, Inc.
67312 Whitter Ave.
McLean, Va 22101
Attn: Dennis Ward

In Reply to your January 2, 2005 Email
RE: FCC ID: KBCIX300AC775WLBT_ATCB001936

Dennis,

We have replied to your comments concerning the above referenced Application below in blue under the original question.

1. Please provide a photo of what is under the covered section of the first photo in the exhibit "Exhibit 9 Internal Photos AC775.pdf".

A new photo showing the section under the shield has been submitted by Sierra Wireless to you directly by email in separate correspondence.

2. Please note that while you have provided the parts list for the BT and the WLAN, you have not provided the parts list for the licensed device. Please provide the parts list for the licensed device.

A separate email correspondence from Ying Wang of Sierra Wireless to you directly, discussed the issue of referring to the tune up procedure provided and not the BOM.

3. Please verify that this device cannot be used in any configuration where the antenna(s) are closer than 2.5 cm to the body. Please verify that no advertising or other documentation shows or indicates that this device can be used in this type configuration.

A statement from Itronix has been uploaded specifically addressing this request.

4. Please note that while the antenna conducted measurements provided may be used, the radiated emissions testing including the simultaneous transmission test data must be with the transmitters in the host listed in the filing (i.e. KBCIX300AC775WLBT). The simultaneous transmission data provided, while referencing the above ID, is listed as being from that of the AC555 device. Please explain.

The simultaneous data references the IX300 with AC555 only for the two Part 15.247 transmitters simultaneous test data and does not include AC555 emissions, only the two Part 15 devices operating on the same channels for a worst case. The BT and WLAN in the AC555 configuration are physically and electrically identical to the BT and WLAN transmitters in the AC775 configuration. The Part 15.247 test data would remain representative of the newly identified device. Simultaneous transmit measurements were made with the AC775 last month and are in the same report but show that cellular and PCS related channels and harmonics.

5. Please note that the MPE report states that all three devices cannot transmit simultaneously. Please also note that the report "Exhibit 6 Test Report Simultaneous Transmit IX300 AC555 WLAN BT.pdf" states that all three devices can transmit simultaneously. Please explain and please reconcile all documentation as to the simultaneous operating capabilities of this device.

The standard User Operating software does NOT allow for all three transmitters to operate simultaneously. So for the purpose of MPE this mode, (all three transmitters transmitting) of operation could not exist when operating with User software. Using Test software we are able to transmit with all three but the user could NOT do this. Where data is provided with all three active, it is done to reduce the number of separate measurements and provide a "worst case" scenario. The equipment complied with the Part 22/24 standards with all three active so although an artificial circumstance, we were not concerned.

The User can transmit with the 1.) AC775 & BT or 2.) WLAN & BT only. The simultaneous data submitted is to cover these 2 modes of operation.

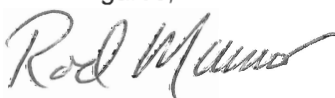
6. Please be precise as to what specific tests from the multiple reports apply specifically to this application. As you have a number of varying reports for different products it is important to clearly state what tests are deemed to apply to the specific application.

The specific test reports are applicable as follows:

Report file name	Applicable to:
Exhibit 06 Test Report 1 Pt 22 24 AC775KBCIX300AC775WLB.T.pdf	Radiated Spurious and Harmonics ERP/EIRP IX300 and AC775 Part 22/24
Exhibit 6 Test Report 2_Pt 15 WM168B MOLEX KBCIX300AC555WLB.T.pdf	Radiated Spurious and Harmonics IX300 WLAN & BT Part 15.247
Exhibit 6 Test Report 3 PT 15.247 BT Test Report IX300AC555WLB.T.pdf	Radiated Spurious and Harmonics Only IX300 WLAN & BT Part 15.247
Exhibit 6 Referenced IX300 Original Twinhead Report WLAN and BT.pdf	All Conducted data for WLAN & BT Part 15.247
Exhibit 6 Sierra Wireless Pt 22_24 OEM Test Report.pdf	All Conducted data for AC775 Part 22/24
Exhibit 6 Test Report Part 15.107_109_207_209 IX300 with AC775.pdf	AC Conducted/ Radiated Emissions for IX300 with AC775 WLAN & BT Part 15.107 & 15.109
Exhibit 6 Test Report Simultaneous Transmit IX300 AC555 WLAN BT.pdf	Simultaneous Transmit WLAN and BT ONLY Part 15.247 from AC555 report and Simultaneous Transmit with AC775, WLAN and BT Part 22/24

I hope to have adequately addressed your concerns. Please let me know if I may provide anything further to assist in your review of this application.

Best Regards,



Rod Munro