Sep. 01, 2005
RE: Itronix Corporation
FCC ID: KBCIX600-BT

Dear Tim,
Here are our answers,

1) Section 15.15(b) prohibits adjustments of any control by the user that will cause operation of a device in violation of the regulations. Accordingly, any proposal to allow the end user to choose extended channels on frequencies outside of an allowable frequency band in the USA is not acceptable. For example, a WLAN device operating according to Section 15.247 on channels 1-11 between 2.4 - 2.483.5 GHz must not have any user controls or software to allow the device to operate on channels 12 and 13 which are outside of the allowed USA band. For instance, the user should not be able to select alternative countries which would allow different channel plans outside of the allowed USA band. Please explain how this device is compliant to this requirement for all 802.11 bands of operation.
ANS: An attestation letter was provided by the bluetooth manufacturer, refer to file named "US only frequency attestation.pdf"

2) You state that the output power of -0.69 dBm is in the expected tolerance. However, please note that it appears that this is nearly 5 dB beneath maximum output power. The FCC expects the tested sample to be at maximum output power. If the tolerance varies by a significant amount, then it is up to the manufacturer and lab to select a sample that is considered at maximum output power. If maximum output power was not present during testing, this device will require retesting. Please review.
ANS: Because the chipset power setting maximum is 0 dBm, so we can't get +4dBm as specification. We will attach a confirmation letter to interpret the power setting of this module which will be set as Max 0dBm. The difference as to the 0 dBm setting and the -0.69 dBm measured was due to the fact that the measurement was made behind Components /traces added between the chip and the actual measurement point used. This is within manufacturing variance for a 0 dBm setting.

3) You state that the device is approved to 15 Subpart B. However please note that this may be approved under a DoC or Certification, each which have different labeling and manual requirements. The labeling suggests DoC however all the information required by 2.1077 does not appear to be provided on a single page in the manual as specified by the FCC. If this is being approved under a DoC please ensure the manufacturer corrects this. If not, then it requires Certification as part of this application and requires additional review. Please review.
ANS: Yes, we have tested this device for 15 Subpart B under a DoC in another test report. I will inform the applicant to add a DOC letter in users' manual. Thanks for your remind.

Please review

Thanks

Daphne