



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

November 23, 2005

RE: ITRONIX Corporation

FCC ID: KBCIX260MPIAC775

I have a few comments on the above referenced Application.

- 1) One side of the Sierra Wireless internal photographs board should be shown with various covers and/or shields shown removed (photo on page 8 of the exhibit provided).
- 2) 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.
- 3) The original information regarding the GPRS modem appears to support 2 antennas, but it is uncertain if this application appears to possibly support only one antenna for GPRS (only one antenna data sheet for GPRS provided) which suggest maybe only one antenna is used. Please explain in further detail or correct as necessary. If necessary, please provide information regarding the missing antenna (blade antenna) as only one data sheet was provided for Part 22/24 antennas.
- 4) Currently for unlicensed devices, the FCC requires ANSI C63.4 – 2003. However compliance appears to be shown to C63.4 – 1992. Please adequately review to ensure compliance under ANSI C63.4 2003.
- 5) For 15.247, the new radiated data performed by spectrum does not appear to clearly show compliance for bandedge emissions. Please correct/explain as necessary.
- 6) The advertising literature implies that the notebook is upgradable. However, for each configuration the FCC requires a different FCC ID and IC requires a different model. Please explain how this is handled if the system is upgradable.
- 7) The advertising mentions user replaceable modules. The FCC has not allowed this except in cases where bio's lock has been implemented to ensure only the approved device may function when installed. Please explain compliance to this.
- 8) Information provided by Sierra states the modem is a Class 12 device. This implies as much as 4 TX, 1 RX slots may occur. However MPE assumes a 50% duty factor which is not truly source based. Since source based may be considered to be higher, the MPE exhibit should be adjusted as appropriate.
- 9) Regarding the Sierra transmitter, information regarding both DC voltages AND currents applied into the several elements of the final radio frequency amplifying device for normal operation over the power range could not be located. Please provide.
- 10) Users Manual appears to be missing information required by 15.105. Please review/correct as necessary.
- 11) Conducted power for GXW emissions appears to come from Celltech report. However the conducted power for G7W emissions could not be located off hand. Please explain where this may be found.
- 12) FCC Part 2 and RSS-133 specifically cite that temperature stability should cover -30 degrees C. Compliance with this temperature does not appear to be provided.
- 13) FYI...Antenna conducted emissions for Part 24 should be done with 1 MHz RBW, not 100 kHz for < 1 GHz.. Due to the margins shown, compliance can be determined using an integration function. However future applications should use proper bandwidths.
- 14) FYI...Please note that this FCC will only cover the WLAN + WAN configuration specified in the application. CDMA, BT and CDPD configurations are not covered by this application.
- 15) FYI...The advertising literature mentions up to 3 RF modules at a time. Please note that different or additional configurations have not been covered by this application.
- 16) FYI...Information stated from training in February 2004 suggests that if the FCC ID on the integrated device is not valid or being used for the configuration integrated, then the FCC ID should be removed, covered, or blacked out, especially in cases where the user may access these areas. The concern is that if the device is being re-approved

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(for final system, new antennas, new RF exposure conditions, Change in ID, co-location, etc) for a different configuration, the original FCC ID is likely not valid and is therefore erroneous. To avoid any compliance issues with reference to incorrect FCC ID's for compliance situations, it is best to remove/cover/blackout these labels. Please note that this information is being passed along as an FYI. It is noted that the manual makes mention of the fact that internal modules may contain different FCC ID's. Please note that generally this fact is not sufficient in the FCC's perspective.

17) FYI...Note: Application cites these do not transmit simultaneously.

IC Specific

18) Please provide labeling information to support the following as required by RSS-GEN 5.2 issue 1?

a) the model name or number as certified (IX260MPIAC775). Please refer to various interpretations recently obtained from IC regarding another Itronix application and provided under a separate email.

19) A REL listing letter as given in our IC form does not appear to have been provided.

20) Recent updates to RSS-102 requires a new attestation which is preferred for IC rather than calculations. Please reference our new IC form (see attachment) which provides this and the new RSS-102 recently issued.

21) It appears that some antennas may be detachable. Therefore the users manual should include information per RSS-GEN 7.1.4, issue 1?

22) Please explain where receiver emissions for the DTS portion of the device may be found in compliance with RSS GEN sections 4.8 and 6, RSS-132 section 4.6 and RSS-133 section 4.5.

23) For a low power license exempt device, does the users manual contain the information required by RSS-GEN 7.1.5, issue 1.? (note: 2 part statement and additional information for detachable antennas).

24) Please explain compliance to RSS-132 section 5.4 and RSS-133 section 5.4.

25) FYI...For 99% bandwidth, in the future, please use VBW > 3*RBW as specified by RSS-GEN, section 4.4.1, issue 1.

26) FYI....The ERP limit for RSS-132 is 6.3 W compared to the FCC's 7.0 Watts...Compliance is still noted however.



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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.