

September 17, 2003

American Telecommunications Certification Body, Inc.  
6731 Whittier Avenue, Suite C110  
McLean, VA 22101  
Attn: Tim Johnson

**SUBJECT: ITRONIX CORPORATION  
FCC ID: KBCIX100AC750  
Part 24(E) Certification  
ATCB File No.: ATCB000747  
Response to Questions - 09/16/03**

Dear Tim:

On behalf of Itronix Corporation is our response to your questions dated 09/16/03 requesting additional information for the subject application.

1. Attached are the internal photographs of the PCMCIA Card.
2. Attached is the revised FCC ID label.
3. The gain of the EUT antenna is 0 dBi and the maximum conducted and EIRP power levels measured were 28 dBm and 29 dBm respectively. The maximum EIRP measured for the original PCMCIA Card approval was 32.5 dBm and the maximum peak conducted power was 28.5 dBm, based on a 4 dB antenna gain using a different antenna. The operational description reference to 2 Watts maximum applies to the rated power for E-GSM band in Europe.
4. Please refer to submitted operational description attachment.
5. Please see attached retested band-edge data and plots.
6. Please see attached retested band-edge data and plots
7. For future filings it is understood that block-edge measurement data is no longer required.
8. Please see attached revised SAR test data table and summary pages listing the ear-microphone accessory for applicable tests.
9. SAR measurements performed without the carry case accessory required a 0.5 cm separation distance for the right side (antenna side) of the device. When the device is placed in the carry case, the thickness of the carry case provides a 0.5 cm separation distance and therefore a separation distance was not required from the carry case.
10. Please see attached revised user manual RF exposure information.

If you have any further questions or comments concerning the above, please contact the undersigned.

Sincerely,



Jonathan Hughes  
General Manager  
Celltech Labs Inc.

cc: Itronix Corporation