



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

September 17, 2003

RE: Itronix Corporation

FCC ID: KBCIX100AC750

I have a few comments on the above referenced Application.

General

- 1) Please provide internal photographs for the PCMCIA Card portion of the device.
- 2) From the font utilized on the label, a difference between 1 and l can not be determined. Please modify the label using a different font so these characters may be distinguished.
- 3) Both the conducted and EIRP powers for this application are around 28-29 dBm (800 mW approximately). However the original device approval for the PCMCIA card was about 32.5 dBm (1.79 Watts - not sure which method of measurement was used). Note that the operational description describes a 2 Watt maximum for GSM transmission. Please explain.
- 4) Please provide DC voltages/currents applied into the several elements of the final radio frequency amplifying device for normal operation over the power range.

EMC

- 5) This device does not appear to comply with the bandedge requirements at 1850 and 1910 MHz (plots on page 23 and 25 of the test report). For instance, the lowest TX channel according to the 731 is 1850.2 MHz, yet the TX appears to be transmitting directly on 1850.0. Similar results are shown at 1910 MHz. Given the 1 MHz span, these plots show transmission approximately 200 kHz below and above the Minimum/Maximum frequencies claimed. Additionally they show non-compliance with the bandedge.
- 6) The results for the bandwidth in section 8.1 do not appear in the appendix as stated.
- 7) FYI, Block edge requirements are no longer required as of discussion with the FCC last week. If you have any further questions regarding this, please let give me a call.

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- 8) It was difficult to determine which configurations included the ear microphone without reading all the descriptions. It is suggested that the table in section 4.0 be updated to list the ear microphone under the body-worn accessory column for all applicable configurations.
- 9) Please explain why 0.5 cm spacing was used for Right side, when all other sides were tested at 0 cm spacing.
- 10) The users manual information regarding RF exposure appears confusing. It mentions not to use closer than 1.5 cm, but then discusses uses down to 0.5 cm. The manual should be clarified.
- 11) FYI, It would have been preferable to perform the dipole verification using a 1900 MHz dipole instead of 1800 MHz since it falls within the TX band.



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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.