

August 31, 2004

Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Stan Lyles

SUBJECT: ITRONIX CORPORATION
FCC ID: KBCIX100XA750WLBT
Part 24(E) - Certification
731 Confirmation Number: EA584003
Correspondence Reference No.: 27403

Dear Stan:

On behalf of Itronix Corporation is our response to your e-mail dated August 18, 2004 requesting additional information for the subject application.

1. Please see attached revised SAR measurement report with DUT right side test data removed based on a non-normal operating configuration. The SAR measurement data table (page 5) shows the sum of the 1-gram averaged SAR levels for GPRS and WLAN/Bluetooth transmit in the max. SAR test position, in order to report a worst-case SAR level for simultaneous transmit operation. Also attached are spectrum analyzer plots showing that the relative radiated output power does not increase during simultaneous transmit operation in each configuration.
2. An area scan measurement was performed in 2450 MHz fluid with the WLAN transmitting only, and the backside of the device placed flat against the planar phantom without the carry case accessory. Due to the level of the signal being too low and the evaluated SAR level was amplified, the 1g-averaged SAR level was not reported. The calculation of the 1g-averaged SAR level is dependent on the accuracy of the extrapolation of the SAR level between the lowest measurement point and the surface. When the strength of the E-field gets close to the ambient electrical noise level this extrapolation is subject to errors. The DASY4 system detects an error and warns of possible amplified values. Therefore, only the peak value of the area scan was reported. It was subsequently determined that the SAR level for the backside of the device with GPRS transmitter on would not increase with simultaneous transmit WLAN on.
3. Please see attached revised user manual. The "0.5 cm gap with no metallic component" statement has been removed and the condition is limited to the specific carry case tested. Please note that the 0.5 cm gap referred to the thickness of the carry case.

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