

September 27, 2006

Timco Engineering, Inc. Telecommunication Certification Body 849 NW State Road 45 Newberry, FL 32669

SUBJECT: ITRONIX CORPORATION

FCC ID: KBCIX100XUSI-WLBT Part 15(C) - Certification (Composite) Limited Modular Approval Application

On behalf of Itronix Corporation is a Limited Modular Approval application for Part 15 Subpart C Certification of the WM-BG-MR-01 802.11b/g WLAN/Bluetooth Combo Module (manufactured by Universal Scientific Industrial Co., Ltd.) installed in the Itronix Corporation IX100X Series Rugged Handheld PC utilizing an internal dipole antenna (WLAN) and internal printed circuit antenna (Bluetooth). The WM-BG-MR-01 802.11b/g WLAN/Bluetooth Combo Module with internal antennas is installed in the IX100X by Itronix Corporation prior to shipment and is not intended for installation or reconfiguration by the end user. A Part 15C certification application (DSS) for the Bluetooth portion of the combo module is submitted simultaneously with this application under the same FCC ID: KBCIX100XUSI-WLBT. The 802.11b/g WLAN and Bluetooth can transmit simultaneously. Co-transmit radiated spurious emissions measurements were evaluated during the EMC measurements described in this filing and were found to be in compliance. A co-transmit SAR evaluation was also performed and the measurement data is reported in the SAR Test Report exhibit in this filing.

The 802.11bg/Bluetooth Combo Module can also be co-located in the IX100X Handheld PC with an optional AirCard 860 Dual-Band GSM/GPRS/EDGE/UMTS PCMCIA Modem (manufactured by Sierra Wireless Inc.). A separate Limited Modular Approval Certification application for the AirCard 860 is submitted simultaneously with this application (FCC ID: KBCIX100XAC860). The Bluetooth portion of the WM-BG-MR-01 combo module can transmit simultaneously with the AirCard 860 modem. Co-transmit radiated spurious emissions measurements were evaluated during the EMC measurements of the Bluetooth and were found to be in compliance. The 802.11bg WLAN and AirCard 860 do not co-transmit (please refer to the applicant's attestation letter). The AirCard 860 is also installed in the IX100X by Itronix Corporation prior to shipment and is not intended for installation or reconfiguration by the end user. The IX100X Handheld PC can be configured by Itronix Corporation to contain either one of the internal radios described above or both. It is the intention and purpose of the two referenced Limited Modular Approval applications that all three IX100X host PC configuration options will be approved for certification within these submittals. Depending on the transmitter configuration(s) installed, Itronix Corporation will label the IX100X host PC accordingly with the appropriate FCC ID label(s) applicable for the specific configuration(s).

Model(s): IX100XUSI-WLBT

Transmitter Type: 802.11b/g WLAN/Bluetooth Combo Module
Host PC Type: Itronix IX100X Series Rugged Handheld PC

Device Classification(s):

Digital Transmission System (DTS) - 802.11b/g WLAN
Part 15 Spread Spectrum Transmitter (DSS) - Bluetooth
Mode(s) of Operation:

Direct Sequence Spread Spectrum (802.11b/g WLAN)
Frequency Hopping Spread Spectrum (Bluetooth)

Transmit Frequency Range(s): 2412 - 2462 MHz (802.11b/g WLAN)

2402 – 2480 MHz (Bluetooth)

Max. RF Output Power Tested: 0.039 Watts (15.93 dBm) Peak Conducted (802.11b)

0.031 Watts (14.98 dBm) Peak Conducted (802.11g) 0.0024 Watts (3.72 dBm) Peak Conducted (Bluetooth) WLAN: Internal Dipole (Top Center above LCD Display)

Antenna Type(s) Tested: WLAN: Internal Dipole (Top Center above LCD Display)

Bluetooth: Internal Printed Circuit (Right Side of LCD Display)

Submitted within this application is the TCB Form 731, applicant's authorization letter, applicant's long-term confidentiality request letter, applicant's attestation letter, applicant's Limited Modular Approval letter, Part 15(C) EMC measurement report data and test setup photographs, SAR RF exposure measurement report data and test setup photographs, FCC ID label and location, internal and external device photographs, antenna specifications, block diagram (confidential), schematic diagrams (confidential), operational description (confidential), WM-BG-MR-01 integrator manual, and the IX100X user manual (preliminary) with RF exposure information.

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

Sincerely,

Jonathan Hughes General Manager Celltech Labs Inc.

cc: Itronix Corporation